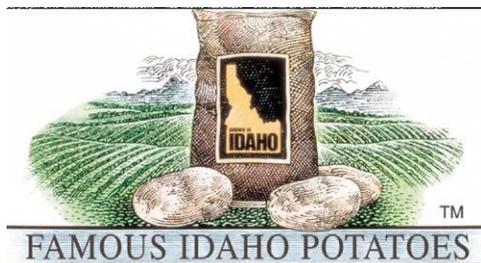


University of Idaho

College of Agricultural and Life Sciences

Good Agricultural Practices (GAP)

Potato GAP Audit Organizational Material



University of Idaho

Table of Contents of Potato GAP Audit Organizational Material

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Introduction on how to use this manual

This material can be found at <http://www.kimberly.uidaho.edu/potatoes/gap.htm> and was developed to coordinate your farming operation's standard operating procedures (SOP) of Good Agricultural Practices (GAP) for food and farm safety with the requirements of the USDA GAP Audit Checklist. It is designed to provide a detailed template for a potato farm's SOP that is directly referenced to the USDA Audit Checklist and the required documentation. Each bullet point of the SOP is referenced to the Audit Checklist requirement (eg. G-3, 1-1, 2-1, 4-1) and a document number (eg. R#1), if a record or documentation is required.

Please note that the SOP template included in this manual needs to be tailored to your specific farming operation since some points may not be applicable. Within this manual there are sections that include preformatted documents, areas to insert maps, and the current USDA Audit Checklist.

Please check for current versions of the USDA Audit Checklist frequently at <http://www.ams.usda.gov/gapghp>. This manual was designed to simplify the necessary requirements to successfully pass the USDA GAP Audit.

List of websites and educational materials that may be helpful

U.S. Department of Agriculture (USDA): Fresh Product Grading and Quality Certification: <http://www.ams.usda.gov/gapghp>

- Download the current USDA Audit Checklist
- View the 'Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables (The Guide)'
- GAP Program Informational Brochure

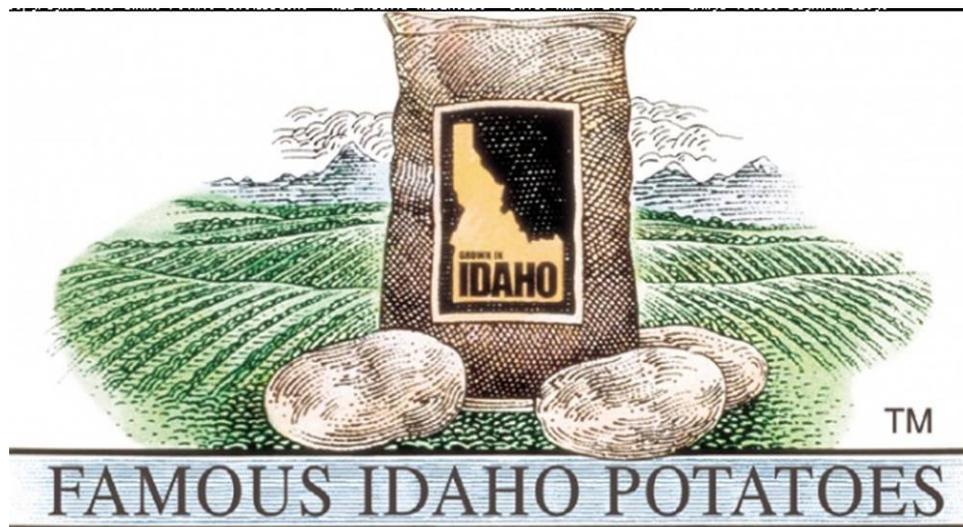
- Good Agricultural Practices Network for Education and Training
Cornell University: <http://www.gaps.cornell.edu/>
 - GAP Online Produce Safety Course-three week web-based course
 - Order video tapes, guides, pamphlets, signs and other materials to help implement your farm and food safety program
 - Links to additional websites

- University of Maine Potato Program, Good Agricultural Practices Information: www.umaine.edu/umext/potatoprogram/gap_good_agricultural_practices.htm
 - Template for Standard Operating Procedure (SOP) for farm and food safety program
 - Utilize forms for a self-audit of the USDA Audit Checklist

- Idaho State Department of Agriculture, FFV Food Safety Program: <http://www.idahoag.us/Categories/InspectionsExams/FoodSafety/indexfoodSafetyHome.php>
 - USDA Audit Checklist and fee schedule

- Primus Labs affiliated audit and fee schedule
- University of Idaho
 - UI Gap Audit Organizational Manual
<http://www.kimberly.uidaho.edu/potatoes/gap.htm>
 - Continuing to Manage Foreign Material for Quality Idaho Potatoes, DVD (English/Spanish)
 - Managing Foreign Material for Quality Idaho Potatoes
 - Cleaning and Disinfecting Potato Storages, VHS
 - To order go to:<http://www.info.ag.uidaho.edu/>
- Idaho Potato Commission: <http://www.idahopotato.com>
- Idaho OnePlan : <http://www.oneplan.org/>
 - Pesticide application recordkeeping, carbon sequestration

Helpful tips and GAP audit information for potato growers is on the next page



2010 and 2011 USDA GAP Audit Information for Growers*

*Highlighted information has been added for the current version

In April 2011 the USDA published a User's Guide for their GAP & GHP Audit Program. It can be purchased for \$25.00 from the USDA website: <http://www.ams.usda.gov/AMSV1.0/gapghp> or the PDF version can be downloaded from Section 1 (Information and Materials) of the UI GAP Manual on the UI GAP website: <http://www.kimberly.uidaho.edu/potatoes/gap.htm>.

USDA GAP Farm Review audits can be performed as soon as crops are visibly growing in the fields.

- ◆ Farm Review audits cannot be done after the field has been harvested.

A signed audit agreement must be on file, in the Boise office, prior to an auditor being sent out for an audit.

- ◆ This agreement stays in effect until the grower asks, in writing, to be released from the agreement. USDA instated a new audit agreement this year (2011), so everyone is required to sign the new agreement. The new agreement will remain in effect as stated above, unless USDA creates a revision.

The grower or farm representative is responsible for making the audit appointment.

- ◆ An auditor will not be sent out until the grower or representative calls to set up an appointment.
- ◆ All audits are scheduled by calling Cindy Stark at 208-332-8672, unless the operation is located in the Magic Valley area.
- ◆ Magic Valley audits are scheduled through our Burley district office at 208-678-8168.

It is not necessary to answer yes to every question to pass an audit.

- ◆ If the total points earned are equal to or greater than 80% of the adjusted total it is a "Passing Score".

Regarding:

Question G-2 'The operation has performed a "mock recall that was proven to be effective";

- ◆ If the audit is only for the Farm Review and/or Harvest, a mock recall is not required the first year in the program.

Question G-3 'Potable water is available to all workers';

- ◆ Potable water definition includes the EPA Total Coliform Rule.
- ◆ Potable water for drinking and hand washing must be tested annually. Tests for drinking water should show that the

microbial contents are within the EPA, state or local guidelines.

- ◆ Municipal water is required to be potable but well water may or may not be potable. Testing of well water will determine if water is potable.

Question G-7 'Employees are washing their hands before beginning or returning to work'. **This question has been reworded on the checklist.**

It now reads:

Employees who handle or package produce are washing their hands before beginning or returning to work.

- ◆ The intended employees for this question are the employees who handle (eg. employees who remove clods and debris at harvest) or who package potatoes.
- ◆ This question may be answered N/A where the workers are not working directly with the potatoes, such as during the Farm Review when the potatoes are underground.

Question G-11, 'Smoking and eating are confined to designated areas separate from where product is handled';

- ◆ The designated areas must be identified in a policy (SOP). For Harvest audits the areas could be a vehicle or equipment cab, designated areas of sufficient distance away from the field or harvest areas, etc. For Storage and Transportation audits, the designated areas could be vehicle cabs or designated areas away from potato handling areas. Be aware this question also refers to employees who are chewing gum and candy.

Question 1-3, 'A water quality assessment has been performed to determine the quality of water used for irrigation purposes on the crop(s) being applied';

- ◆ A grower must have documentation of a minimum of one water test, per irrigation source, per field, for surface and/or well water, for all audits performed prior to July 16.
- ◆ A minimum of two water tests for each surface water irrigation source for audits conducted from July 16 through September 15.
- ◆ A minimum of three water tests for each surface water irrigation source for audits conducted after September 15.
- ◆ Each well used for irrigation must have an annual test.

To receive credit for question 1-4, 'A water quality assessment has been performed to determine the quality of water used for chemical application or fertigation method';

- ◆ A grower must have documentation of testing on water used to mix chemicals and/or fertilizer.
- ◆ If the water used to mix the chemicals and/or fertilizer is sourced off-site (aerial applicator, spray service, etc.) a copy of that companies water test must be on file.

Water for irrigation must be tested for, at a minimum, Total Coliform and E-coli.

- ◆ Irrigation water test results must be enumerated. USDA has stated that since there is no specific allowable amounts for E. coli in irrigation water, Idaho recreational water standards are applicable. The number used in Idaho is for secondary contact which is 576 E. coli organisms per 100 ml of sample. To date, there has not been any number established for Total Coliform. A policy statement should be included in your SOP outlining the step(s) that will be taken if E. coli levels exceed the threshold.

Field Harvest audits must be done when the field is being actively harvested.

Storage and Transportation audits can only be done when there is product going into storage or product already in storage. These audits can be scheduled for the same visit if harvest and storage activities coincide.

The Storage and Transportation audit has 250 total points possible but many of these questions are not applicable to potatoes and will not be counted in the total points.

- ◆ Question 4-7 asks about a policy for the handling of finished product that has come in contact with the floor. Raw, bulk potatoes stored in cellars are not considered "finished product" resulting in an N/A answer and 15 less available points.
- ◆ Questions 4-17 thru 4-23 may be answered N/A
- ◆ Questions 4-8, 4-24 thru 4-27 are usually answered N/A, further decreasing the points available.

Payment in full, including any late fees, must be received prior to audit certificate being mailed out or sent by email.

- ◆ If an account has late fees for two months or more, the account will be marked as cash only and full payment must be made at the time of service for any further services requested.



United States
Department of
Agriculture

Agricultural
Marketing
Service

Fruit and
Vegetable
Programs

Fresh
Products
Branch

Good Agricultural Practices and Good Handling Practices Audit Verification Program

User's Guide

April 2011

USDA

GAP & GHP

AUDIT PROGRAM

FRUIT & VEGETABLE PROGRAMS

Audit User's Guide for GAP & GHP

This User's Guide is specifically developed and designed by the United States Department of Agriculture, Agricultural Marketing Service, Fresh Products Branch to provide information about the USDA Good Agricultural Practices & Good Handling Practices (GAP&GHP) Audit Verification Program.

This User's Guide does not establish any substantial rule not legally authorized by official Branch Policy.

Questions about this User's Guide can be directed to the Fresh Products Branch's Audit Management Section in Washington DC.

April 2011

******This publication may be duplicated without authorization from USDA. ******

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GENERAL INFORMATION

This User's Guide is intended to provide guidance to the fresh fruit and vegetable industry on the requirements of the USDA Good Agricultural Practices and Good Handling Practices Audit Verification Program (GAP&GHP) and prepare for a successful audit. This Guide does not address every specific question on the USDA GAP&GHP audit checklist, but covers all the major topic areas of the audit.

USDA AMS and state departments of agriculture who work with USDA AMS through cooperative agreements also conduct commodity specific audits for the leafy greens, tomato and mushroom industries. These audits fall under the general guidelines of the USDA GAP&GHP program. Each commodity specific audit has its own set of specific requirements and audit checklists. Please refer to the USDA GAP&GHP website at www.ams.usda.gov/gapghp for links to these commodity specific audit programs.

BACKGROUND

In October 1998, the U.S. Food and Drug Administration (FDA) issued a guidance document for the fresh fruit and vegetable industry which provided general guidelines for reducing the risk of contamination of fresh produce by microbial organisms. The document, "*Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables*," (The FDA Guide) provides information about high risk areas for contamination and how to avoid or minimize such contamination. Shortly after the release of The FDA Guide, many wholesale and foodservice buyers of fresh fruits and vegetables began requiring their suppliers to undergo 3rd party audits which provided assurances they were following good agricultural practices (GAP) and good handling practices (GHP).

In response to numerous requests from the fruit and vegetable industry, the USDA Agricultural Marketing Service (AMS) in cooperation with the Association of Fruit and Vegetable Inspection and Standardization Agencies (AFVISA) developed an audit based program to verify conformance to The FDA Guide. In August 2001, USDA AMS approved and conducted a pilot project for the GAP&GHP audit, and in January 2002, USDA AMS formally implemented the USDA Good Agricultural Practices & Good Handling Practices (GAP&GHP) audit verification program. It is offered to the fruit and vegetable industry and assesses an operation's efforts to minimize the risk of contamination of fresh fruits, vegetables and nuts by microbial pathogens. The program does not guarantee the product is free from microbial contamination, but verifies the participant has taken proactive measures to reduce the risk of contamination by adhering to generally recognized best practices. The responsibility for product safety and the continued observance of best practices rests with the operation producing and handling the fresh product.

Additional information and a copy of the current checklist can be found at www.ams.usda.gov/gapghp.

The USDA GAP&GHP audit verification program is a voluntary, user fee funded program. The USDA Agricultural Marketing Service operates under the Agricultural Marketing Act of 1946 [7 U.S.C. 1621], and offers voluntary, user fee funded programs which assists in the strategic marketing of agricultural commodities. The U.S. Food and Drug Administration is the federal agency with regulatory authority for fresh fruits and vegetables.

AUDITORS

All auditors used to perform the USDA GAP&GHP audit are either federal employees of USDA AMS, or state department of agriculture employees who are specifically trained and licensed to perform audits on behalf of USDA AMS. Most auditors are fruit and vegetable inspectors who inspect and grade produce on a daily basis as well as perform audits.

USDA AMS sets the minimum criteria for all AMS personnel used to conduct audits. The following bullets highlight the auditor requirements for the GAP&GHP program:

- Auditors must have a minimum of three years work experience in the area of fruit and vegetable production, handling or marketing; or a Bachelors Degree in an agricultural related field; or a combination of work experience and education.
- Auditors must demonstrate knowledge of the production, handling, distribution and marketing of fresh fruits and vegetables.
- Auditors must undergo formal classroom training as well as on the job training.
- Auditors are evaluated by program management before being licensed as an auditor.
- Auditors must take yearly refresher training specific to the audit program they are licensed.
- Auditors must take yearly ethics training.
- Auditors must complete 80 hours of continual professional development every three years.
- Auditors are evaluated on a yearly basis.

USDA licensed auditors provide impartial, prompt third party services to the fruit and vegetable industry and have no financial interest in the products and services they are auditing. In order to remain impartial, auditors are prohibited from providing specific recommendations to operations on the development of their food safety plan or actions which need to be taken by the operation in order to be compliant with the USDA GAP&GHP program requirements. Auditors may answer general inquiries and refer inquiries to food safety experts such as cooperative extension specialists.

DEVELOPMENT OF A FOOD SAFETY PROGRAM

The development of a food safety program is recommended for any operation which produces or handles fresh fruits and vegetables, not just for operations who wish to participate in the USDA GAP&GHP audit verification program.

A food safety plan is a written document that covers all aspects of the growing and handling processes, and evaluates the potential sources of risk. The plan indicates what steps and procedures the operation will take to reduce the risks of contamination by chemical, physical, or microbial hazards.

To assist operations in the development of a food safety plan the FDA and the fruit and vegetable industry have developed commodity specific guidance documents which outline the best practices of the specific commodity. The FDA has released four commodity specific guidance documents for leafy greens, melons, tomatoes and fresh cut fruits and vegetables. Trade and commodity associations have developed their own set of guidance documents including watermelons, strawberries, mushrooms, leafy greens, tomatoes, and green onions. Other guidance documents are currently in development.

Many university Cooperative Extension programs across the country have developed templates or examples of produce specific food safety plans to assist their constituents develop food safety plans. Operations should contact their state Extension Service program or visit the National GAPs Program website for further information at <http://www.gaps.cornell.edu>.

For operations wishing to participate in the USDA GAP&GHP program, the first step in preparing for an audit should be the development and implementation of a food safety program. The produce food safety program should be written by the operation and shall define specific, measurable steps taken by the operation to reduce the risk of microbial, physical and chemical hazards from contaminating the product. A well-written plan will detail all aspects of the growing and handling processes and shall also outline the corrective actions the operation will take if it is suspected or known product has become contaminated. Typically the food safety program takes the form of a manual to facilitate the easy dissemination and recording of the operations food safety plan. The food safety plan needs to incorporate the USDA GAP&GHP audit verification program requirements and applicable policies. The following points are key items to consider:

- The operation must create a food safety program that accurately reflects their operation.
- The operation shall develop Standard Operating Procedures (SOPs) which outline the policies and procedures for the operation.
- The operation must designate a person that oversees the food safety program.
- The produce food safety program must be implemented and followed.
- The operation must determine what to document and keep records for. The operation must also keep all documents and records current.
- The operation shall document corrective actions taken which verifies adherence to their food safety plan.

PREPARING FOR AN AUDIT

For farming operations/packinghouses wishing to participate in the USDA GAP&GHP program, the operation should implement their produce food safety program

as close to the beginning of the growing season as possible. Starting early in the season allows the operation to make any necessary changes to their policies and procedures, as well as accumulate documents and records verifying their food safety program. Additionally, once the growing season starts, operations may not have the time and/or resources available to develop and implement a viable food safety program.

Wholesale distribution centers/terminal warehouses/commercial storage facilities may implement their food safety program at any point during the year. These operations should take into consideration the time it will take to accumulate documents and records verifying their food safety program before scheduling an audit.

INTERNAL AUDIT

Although not a requirement of the program, it is recommended that the operation conduct a self or internal audit prior to scheduling an official USDA audit. A self or internal audit allows the operation to find areas of improvement and take corrective actions before the actual audit. Some Cooperative Extension programs will work with their growers and assist in performing an internal audit of the operation.

Operations can utilize the USDA GAP&GHP audit checklist to perform the internal audit which is available on the USDA GAP&GHP website or by contacting the local inspection office.

DOCUMENTATION

An important component of any audit based program is the review of documents and records. Since the auditor is not at the operation on a daily basis, documents and records are necessary to verify policies and procedures are in place, and certain tasks have been completed throughout the year.

The operation shall keep records as necessary to document adherence to their food safety program, USDA GAP&GHP program requirements, and local, state and federal regulations. The operation's food safety plan shall address what documents and records shall be maintained and the policies and procedures for managing the documents.

For the purposes of the USDA GAP&GHP program, the audit checklist defines when documents are required and what type of documentation is necessary. These are defined in the last column of the audit checklist as a D, P, or an R. Operations may decide to keep additional documentation than is required by the USDA GAP&GHP program, but at a minimum, those questions on the audit checklist which are identified with a D, P or R require documentation.

D=Document

Any question designated with a D requires a combination of written standard operating procedures outlining company policies and procedures, records of actions taken, and/or other documents which may be necessary to support the food safety plan.

P=Policy

Any question designated with a P requires a written policy or procedure to appear in the operation's food safety plan.

R=Records

Any question designated with a R requires a record which shows a process has been completed or record an action taken.

SCHEDULING AN AUDIT

An operation shall initiate the scheduling of the audit at least two weeks in advance of their anticipated audit date by contacting the local USDA inspection office. The USDA does not automatically contact operations who have participated in previous years to schedule its yearly announced audit. It is the operation's responsibility to schedule the audit.

A list of USDA inspection offices is available on the USDA GAP&GHP website or by calling the Fresh Products Branch at 800-560-7956, Extension 5. In addition, audits may be requested using the FV-237A form, located in the appendix of this User's Guide, and faxing to the local USDA inspection office. When contacting the local inspection office, be prepared with a list of anticipated dates the operation is available for an audit. All services are offered on a first come, first served basis. Once an auditor is assigned, he/she will contact you to make arrangements for the audit. Be prepared to provide the auditor with a point of contact, the contact's information, physical location/address of the audit site and other information necessary for the audit. If the operation has a large non-English speaking workforce, the auditor may ask the operation to provide a translator in order to communicate with the workers during the audit if he/she does not speak the language of the workforce.

PARTICIPATION AGREEMENT

The auditor will provide the operation with USDA form FV-651, the Participation Agreement. An example of the FV-651 form is in the appendix of this guide. The Participation Agreement outlines the expectations of the operation and the USDA in performing the GAP&GHP audit. Form FV-651 must be signed by a management representative of the operation and submitted to the auditor prior to the start of any audit. Without the form, no audit services can be provided.

THE AUDIT

The actual audit is broken down into four main areas:

- Opening Meeting - The lead auditor introduces the audit team, communicates the agenda of the audit, answers questions from the auditee, and explains the audit process so everyone knows what to expect during the audit.
- Conducting the audit - The audit team will review documents and records, interview employees, witness processes and observe the operation to determine compliance to the operations food safety plan and the USDA GAP&GHP program requirements.
- Team Caucus - After the audit team has finished evaluating the operation, the team will meet and discuss any findings, address any concerns among the team members, and finalize the audit.
- Closing Meeting - The lead auditor will meet with the operation's representatives and review the findings of the audit. The audit team will also answer any questions from the auditee and explain any observations.

There are distinct types of audits which may be applicable to the operation during the year; the initial audit, the follow-up audit and the unannounced verification visit.

INITIAL AUDIT

The initial audit is the annual announced audit that verifies the farm/facilities compliance with the requirements of the USDA GAP&GHP audit verification program. A USDA GAP&GHP audit is valid for one year from the date of the initial audit.

FOLLOW-UP AUDIT

A follow-up audit is performed when either the farm/facility's initial audit or unannounced verification visit does not meet the program requirements. If an operation does not meet program requirements, the auditor will create a corrective action report and the operation must address the non-conformities prior to the scheduling of a follow-up audit. For specific instructions, refer to the non-conformity and corrective policy section.

- If the operation fails to meet program requirements due to an "automatic unsatisfactory" condition, the follow-up audit must consist of all scopes originally requested on the initial audit.
- If the operation fails to meet program requirements because of a low score for one or more scopes, only those scopes which failed and the General Section must be completed on the follow-up audit.

UNANNOUNCED VERIFICATION VISIT

An important component of the USDA GAP&GHP audit is the use of unannounced verification visits. Unannounced verification visits are conducted at some point during the season after the operation has successfully passed an initial or follow-up audit. It is used to verify that a farm/facility is in consistent conformance with the requirements of its food safety plan and the USDA GAP&GHP program requirements.

The unannounced verification visit differs from the initial audit in that the auditee does not know specifically when the auditor will be on site to perform the audit. The unannounced review will generally verify conformance through observation but may also require a further review of documentation.

USDA policy sets the following conditions for when and how many unannounced verification visits shall be conducted:

Part 1- Farm Review

For operation which only grow one commodity in a production area during a growing season such perennial crops, potatoes, onions, etc., no unannounced verification visits for the production area are required.* For those operations that grow multiple commodities during the growing season using the same crop production area, unannounced verification visits of the farm are required.

Parts 2 through 6 of the GAP&GHP audit

- For an operation which is in operation for 30 days or less, no unannounced verification visits are required.*
- For an operation which is in operation for 31-90 days, a minimum of one unannounced verification visit shall be conducted.*
- For an operation which is in operation for 90 days or more, a minimum of two unannounced verification visits shall be conducted.*

*Note In all cases, the USDA reserves the right to conduct additional unannounced verification visits if there is specific reason to suspect the operation is not in compliance with the GAP&GHP program requirements or their own food safety program.

PERFORMING AN AUDIT FOR A DIVERSIFIED FARMING OPERATION

It is not a requirement to perform a separate audit for every separate commodity grown on the farm, however operations may choose to do so if they so desire. USDA AMS policy allows diversified farming operations to cover all the commodities grown on the farm under the same audit subject to the following conditions:

- All commodities covered by the audit must be declared during the initial audit and cannot be added later in the season. The food safety plan must address the various risks associated with all the commodities being audited. For instance if a berry grower hand picks strawberries but mechanically harvests blueberries, the food safety plan shall address the potential risks and corrective actions associated with each of these activities.
- The auditor must have the opportunity to observe the crop(s) being grown and harvested during the initial audit or subsequent unannounced verification visits. As an example, if the operation schedules an audit for August 1st, any crops which have been completely harvested prior to August 1st cannot be listed on the

audit. The auditor may not actually witness every commodity listed being harvested, but needs to have the opportunity to observe.

- Operation would be subject to the appropriate number of unannounced verification visits determined by the length of the growing season for all the commodities produced.

The following is an example of how performing a GAP&GHP audit for a diversified operation would work. ABC Fruit and Vegetable Growers Inc. produces a wide variety of fruits and vegetables including asparagus, strawberries, sweet peas, tomatoes, peppers, peaches, nectarines, apples, pears, potatoes, broccoli and cauliflower and wants a USDA GAP&GHP audit. The operation is in production from the start of the growing season on April 1st to approximately October 31st.

- ABC Fruit and Vegetable Growers Inc would call and schedule their initial audit when the spring crops (asparagus, strawberries and sweet peas) are being harvested. However, they would declare all twelve of the commodities grown when scheduling the audit.
- The auditor would perform the initial audit and cover the General Section and Part 1 Farm Review of the entire farming operation. The auditor would also perform Part 2 Field Harvesting and Field Packing Activities on the asparagus, strawberries and sweet peas. In addition because the operation is in production for more than 90 days, the auditor would inform the operation there will be two unannounced verification visits sometime during the rest of the growing season. The auditor would then schedule the first unannounced visit to coincide with the harvest of the tomatoes, peppers, and stone fruit, and the second unannounced visit to coincide with the harvest of the remaining commodities.

NON-CONFORMITY AND CORRECTIVE ACTION POLICY

A Corrective Action Report (CAR) is required for any GAP&GHP audit which fails due to non-conformities from a specific “automatic unsatisfactory” or because a particular scope fails to meet the minimum program requirements.

The auditor will document the non-conformity(s) observed during the audit on the CAR form and submit it with the audit report at the closing meeting. If the operation wishes to continue in the GAP&GHP program, it must review the non-conformity(s) listed on the Corrective Action Report form and develop a plan to fix or address them. Corrective actions are typically taken in two steps, a short term corrective action and a long term corrective action (sometimes referred to as a root cause analysis). Short term corrective actions are taken to immediately address a deficiency. For example, if an auditor observes a restroom without any soap, toilet paper and paper towels, the operation’s short term corrective action is to stock the restroom with the appropriate supplies. A root cause analysis reviews the deficiency if it occurs frequently or requires long term investment. In the example above, if the auditor investigated why the restrooms were always out of supplies and found their food safety program didn’t designate someone to check the bathrooms on a regular basis and restock as needed.

Designating someone to handle the bathroom supplies would be a long term or root cause corrective action.

Once the operation has reviewed and developed a corrective action for the non-conformities listed on the audit, it will submit the corrective actions to the auditor for review. The auditor will review the corrective actions and sign off on the Corrective Action Report if he/she feels the corrective actions listed will reasonably address the non-conformity. Ultimately the corrective actions will be verified during a follow-up audit or unannounced verification visit.

AUDIT SCOPES

The USDA GAP&GHP audit is divided into seven sections or scopes, each which covers a specific portion of the supply chain. The scopes of the audit are:

- General Questions
- Part 1 – Farm Review
- Part 2 – Field Harvesting & Field Packing Activities
- Part 3 – House Packing Facility
- Part 4 – Storage & Transportation
- Part 5 – (No Longer Used)
- Part 6 – Wholesale Distribution Center/Terminal Warehouse
- Part 7 – Preventative Food Defense Procedures

USDA considers a good agricultural practices audit to consist of Part 1 Farm Review and Part 2 Field Harvest & Field Packing Activities and a good handling practices audit to consist of Part 3 House Packing Facility and Part 4 Storage & Transportation for pre farm gate operations or Part 6 Wholesale Distribution Center/Terminal Warehouse for post farm-gate operations. Part 7 Preventative Food Defense Procedures is an optional scope for those operations which need verification of food defense.

The operation shall designate which scopes of the audit the auditor will perform when requesting the audit.

GENERAL QUESTIONS

The General Questions are a mandatory scope of every audit (except for a Part 7 Food Security only audit) and cover overarching food safety issues which are applicable to any audit. In order to successfully pass the USDA GAP&GHP audit, the operation must meet the requirements of the General Questions portion of the audit. The following sections outline the major topics covered by the General Questions.

FOOD SAFETY PLAN

USDA policy requires that an operation develop and implement a documented food safety program. The program must include a food safety manual which includes standard operating procedures (SOP's), and/or documentation which outline the operation's policies and work instructions for adhering to the food safety program. It may also contain information or references pertaining to self audits of the program or management reviews of the program. Other similar documentation may also be applicable and acceptable if it indicates that an established food safety program is in place.

In addition, it is required that the operation has identified a specific person(s) to implement and oversee the food safety program. The person(s) need to be formally identified in the food safety plan, organizational chart, or similar documentation.

TRACEABILITY

The food safety program shall include a documented traceability program. A traceability program in its simplest form is the ability to know where product was received from (one step back) and where product was sent to (one step forward). The operation needs to develop and implement policies and procedures for a traceability program. There are commercially available traceability programs for the produce industry which can assist operations in implementing a traceability program. For further guidance operations can contact their trade/commodity associations, state horticultural associations or county extension agent.

The Bioterrorism Act of 2002 requires certain handlers of foods to keep records which allow the handler to keep track of produce "one step forward" and "one step back" within the food chain. For producers, keeping records and uniquely identifying product moving out of the field to its next destination (packing house, storage cellars, end user, etc.) is an important component of a traceability program. For product moving in bulk from the field to a packing house or storage facility, records such as load tickets, field harvest records that move with the load or other similar records that identify where the product originated are examples of identification. For products that are field packed, the individual cartons or master containers should be clearly identified with the company information including company name and address and other identifying marks as outlined in the company's traceability program.

RECALL PROGRAM

A recall program is defined as the ability to pull product from the marketplace once it has left the operation's control. The operation needs to develop policies and procedures which allow it to recall product by working with their suppliers and customers to track the path the product takes from the farm to the consumer. A recall is a means to return marketed product to its origin or to remove it from the market place and have verifiable evidence that all product being recalled is accounted for. A "mock recall" is a practice exercise that is used to determine where product is shipped and whether or not it can be returned to the origin or removed from the marketing chain.

Operations must have some documented evidence of completing at least one mock recall prior to the audit. Documents must indicate the customers contacted, the amount of product remaining from the original shipment, and the disposition of product which could not be effectively recalled.

The following is an example of a mock recall:

- A packinghouse generated 5,000 cases of apples on January 15th from grower X lot 1234. The packinghouse labeled the apples with their name, address and a lot code of 11511.
- The 5,000 cases of apples were shipped to five different retailers, each receiving 1,000 cases.
- The packinghouse initiates a recall of lot 11511. The individual(s) responsible for performing the mock recall contacts the five retailers who received apples from lot 11511 and informs them they are performing a mock recall. The packinghouse forwards a form to each retailer asking to supply an accounting of the number of cartons from lot 11511 still in their possession and the number of cartons sold. The form will contain instructions on where to send the form when completed and the timeframe when it must be sent back. The recall plan should outline the timeframe required to complete the mock audit.
- The packinghouse summarizes the forms from the five retailers and determines the number of cartons still in the retailers control and the number that are not.

In the event of an actual recall, the operation shall develop a procedure on how they want the product being recalled to be handled. Does the operation want it returned? Will the operation allow the buyer to dispose of it and submit proof the product has been dumped?, etc. This needs to be communicated to the buyer so they can effectively manage their inventory as well.

WORKER HEALTH AND HYGIENE

One of the primary risks associated with fruits and vegetables is the potential introduction of pathogens through poor worker health and hygienic practices. The General Questions section of the USDA audit covers, in great detail, areas which need to be addressed regarding worker health and hygiene. In addition, other scopes of the audit address worker health and hygiene issues related to those scopes such as an operation's glove and jewelry policies, or location of portable sanitation units in the field.

The operation's food safety plan shall address worker health and hygiene issues and develop SOPs which address them. This should include a training program to educate workers on the operation's SOPs. A solid training program is an essential component of a food safety program. Examples of SOPs include:

- Ensuring potable water is available to all workers;
- Ensuring all workers and visitors to the location are required to follow proper sanitation and hygiene practices;
- Providing training on proper sanitation and hygiene practices to all staff;
- Verifying employees and visitors are following good hygiene/sanitation practices;

- Confirming employees are washing their hands before beginning or returning to work;
- Posting readily understandable signs that instruct employees to wash their hands before beginning or returning to work;
- Servicing and cleaning all toilet/restroom/field sanitation facilities; and
- Confining smoking and eating to designated areas separate from where product is handled.

The General Questions section also requires the operation to develop a blood and bodily fluid policy, and a policy which addresses workers who report to work with symptoms of forborne illness.

The USDA GAP&GHP audit requires that all sanitation facilities must be properly supplied with single use towels, toilet paper, and hand soap or anti-bacterial soap and potable water for hand washing. Hand sanitizers are not an acceptable substitute for hand washing and are not to be used as the sole method for hand cleaning. The number and placement of sanitation facilities must comply with all applicable local, state and federal regulations. At a minimum the Occupational Safety and Health Administration (OSHA) requires one bathroom per 20 employees.

PESTICIDE/CHEMICAL USE

The operation shall use all pesticides and other pre or post harvest materials in a manner consistent with prevailing regulations and the labeled instructions. This includes following state licensing requirements for pesticide applicators.

FARM REVIEW

The Farm Review scope of the USDA audit mainly addresses the crop production areas and adjacent lands, domestic and wild animals, as well as the inputs used to produce the crop such as water and soil amendments.

WATER USE

For the purposes of the USDA GAP&GHP program, water use is defined as either agricultural water used for irrigation, frost protection, fertigation, chemical application or other pre-harvest purposes, and post harvest water used on the product after it has been harvested. An example of post harvest water use is water used to wash the product, transport the product through the grading and packing line (dump tanks, flumes, etc.) or apply post harvest chemicals. Operations must have knowledge of the water quality used in order to determine whether or not the product is reasonably likely to become contaminated through the application of or submersion into water.

For agricultural water, the USDA GAP&GHP program requires the operation perform a water quality risk assessment to determine if the water quality is appropriate for the crop(s) it's being used on. The risk assessment should include the water quality, the type of irrigation method, and the crop being irrigated. The results of the risk

assessment shall be used to determine an action level where the operation determines water quality is not suitable for use without taking a corrective action. Water tests are required to be conducted on a scheduled frequency to verify water quality is meeting the operation's action threshold as outlined in their SOPs.

The USDA GAP&GHP program sets the following testing frequency:

- **Municipal water:** Test results are acquired from the local water authority annually or tested by the operation at least annually.
- **Well water:** Water is tested one time during the growing season. If fecal coliforms are present, the well is treated with a sanitizer to reduce pathogen levels and is retested. Wells are monitored to make sure casings are secure and well-maintained and that livestock and manure storage areas are excluded from the well recharge and pumping area.
- **Surface water:** Water is tested three (3) times during the growing season – first at planting, second at peak use, third at or near harvest.

There is not a national irrigation water standard which sets the minimum microbial levels allowable for irrigation water. However, there are many commodity specific guidelines available which give recommendations for water quality. These can serve as a reference source for an operation when determining specific thresholds for their irrigation water. For instance the CA & AZ Leafy Greens Marketing Agreements and the Food Safety Standard for the Tomato Supply Chain identify the microbial requirements of the EPA Recreational Water Standard as the threshold for irrigation water.

For post harvest water applications, the USDA GAP&GHP program requires that the water used meet the microbial requirements of the US EPA Drinking Water Standard. Any post harvest water use which does not meet this standard will result in an "automatic unsatisfactory" assessment on the audit.

SOIL AMENDMENTS

Animal manure and biosolids represent a significant source of potential contamination. However, properly treated manure or biosolids can be an effective and safe fertilizer. Raw animal manure or raw biosolids used as a fertilizer or enters water sources through runoff may contain pathogens of public health significance that can contaminate produce.

The operation shall conduct a risk assessment to determine if and when raw manure or biosolids are appropriate to use. The type of crop and growing conditions are all factors in the risk assessment. For example, raw manure applied to a newly planted orchard is less of a risk than raw manure applied to a vegetable crop grown on the ground. The USDA GAP&GHP Program requirements state that if raw manure is used, it must be applied at least 2 weeks prior to planting and a minimum of 120 days prior to harvest. There are also several commodity specific guidance documents which are more restrictive than the USDA GAP&GHP program and either do not allow the use of raw manure or have a one year restriction on the application of raw manure. Operations shall check to see what the commodity specific recommendations and

prevailing regulations are for their commodities regarding the use of manure and biosolids.

Animal manure or biosolids which are composted require a documented composting process be developed and available for review. If purchasing composed manure, has documentation from the composter listing the process used and test results showing the process effectively controlled the pathogens of concern should be maintained. If an operation has questions regarding proper composting procedures, contact the Cooperative Extension Service in your state. Most all Extension Services have developed proper composting procedures and have this type of information readily available.

ANIMALS/WILDLIFE/LIVESTOCK

Animals pose a potential source of contamination for fruit and vegetable crops. Domestic animals which can be controlled such as livestock or pets need to be excluded from entering crop production areas in order to reduce the potential for contamination. However, when farm service animals (horses, oxen, and mules) are used, an operation shall address potential sources of contamination through a risk assessment and documented SOP's to control hazards caused by these animals and remediation steps which will be taken if they cause contamination.

The USDA GAP&GHP program requires operations to monitor for the presence or signs of animals. Based on the results of the monitoring, if necessary take measures to reduce the opportunity for animals from entering the crop production areas. This does not mean total exclusion; farming operations are never going to be able to completely exclude wild animals from entering crop production areas. However, every effort should be made to limit the access to the production areas. When needed, measures should be taken to reduce the entry into crop production areas by wild animals. This can be accomplished many ways, including such items as noise cannons or scare balloons to scare away birds and migratory water fowl, or fencing /other barriers or deterrents which limit wildlife access.

Operations shall also consider any local, state or federal regulations when developing mitigation strategies for wild animals. Regulations may limit the options for controlling wild animals. Co-management strategies which balance food safety concerns with wildlife control and not just remove riparian areas, grass buffer strips and other conservation practices should also be considered. Operations can contact the local Natural Resources & Conservation Service or their local county extension agent for more information on co-management.

LAND USE & LAND USE HISTORY

The operation must consider the crop production areas and adjacent land use through a documented land use risk assessment. Any risks reasonably likely to cause chemical, physical or microbiological contamination of the produce which are identified by the risk assessment must be addressed and the crop production area tested to validate the hazard has been addressed. While adjacent lands may not be the property

of the operation, the effects they have on the crop production areas needs to be evaluated and mitigation strategies put in place to minimize the impact of the hazard on the ground. For example, if the adjacent ground is uphill houses a concentrated animal feeding operation, proactive steps to minimize the opportunity for runoff to flow through the crop production area must be taken.

Flooding which is caused by the overflow of a body of water shall be documented and if it occurs in season, an assessment is performed to determine if the flooding contaminated the product. The operation should consider testing the product and/or soils before harvesting if sources of contamination are located in the general vicinity of the crop production areas.

The land use risk assessment shall also consider the location of the operation's sewage treatment/septic system or nearby municipal/commercial sewage treatment facilities. The operation shall also verify their sewage treatment/septic system is functioning properly and does not lead to a contamination risk.

FIELD HARVEST & FIELD PACKING ACTIVITIES

The Field Harvest and Field Packing Activities section of the audit covers the harvesting of commodities in either the field or greenhouse operations. It also covers the packing of such commodities for shipment when it occurs directly in the field or greenhouse and is not sent to a packinghouse for further sorting or grading. The emphasis on this scope is the harvesting activities, and the containers and equipment which are used to pack the product. Employee health and hygiene are also an important component of field harvest and field packing and are covered in the General Questions section of the audit.

USDA policy only allows an auditor to perform this scope of the audit when commodities are actively being harvested and there is activity in the crop production area. It is not a requirement that the auditor observe every commodity listed on the audit being harvested, however the food safety plan shall address all the commodities being harvested, and the different risks associated with different harvesting methods. (i.e. mechanically harvested vs. hand harvested). Records for all commodities harvested are maintained for traceability.

PRE-HARVEST ASSESSMENT

The farm operation must have completed a pre-harvest assessment on each production area prior to harvesting any crop being certified by the audit. The assessment may include statements which address known risk that are applicable to the operation such as:

- Are toilet and wash facilities properly located?
- Is potable water available for workers?
- Are harvest containers available, clean, well located and protected?
- Is harvest equipment available and in good condition?

- Is there evidence of unauthorized entry in the crop area and if so, has it been investigated?
- Is there evidence of domestic or wild animal crop damage?
- Is there evidence of physical contamination in the crop area?
- Are fuel and chemicals which might contaminate crop areas isolated?
- If areas are contaminated are they isolated for “no-harvest”?
- Are there any other notable sources of biological or physical contamination such as dump sites, manure, burning debris, water that may affect food safety?
- Is transportation equipment clean and available?

The assessment may include other information as determined by the operation.

FIELD SANITATION UNITS

The number and placement of sanitation facilities must comply with all applicable local, state and federal regulations. Operations shall also have a documented emergency clean-up procedure in case contamination occurs. The procedure should include what will be done to contain the spill and to prevent additional contamination, what will be done to clean up the spill and what will be done with contaminated product.

HARVESTING CONTAINERS & EQUIPMENT

The farming operation shall keep harvest containers (picking buckets, baskets, bulk bins, etc.) as clean as practicable to prevent cross-contamination of fresh produce. These are some key areas to consider which are covered in the GAP&GHP audit:

- Harvest containers used repeatedly during a harvest should be cleaned on a scheduled basis as outlined in the food safety plan.
- If the farming operation stores harvest containers outside, proactive steps shall be taken to minimize harboring rodents and other pests in the harvesting containers.
- Harvesting containers stored outside should be cleaned and sanitized before being used to haul fresh produce.
- Operations shall also instruct workers to only use harvesting containers for their intended purpose, and not to use them for collecting trash or transporting personal items unless they are designated for that use.
- Final packing containers used in field pack operations shall be protected from sources of contamination.
- Only new or sanitized containers are used for packing the product.
- Operation shall repair or discard damaged harvesting containers.
- Harvesting equipment and machinery which comes in contact with the product is in good repair.

- Light bulbs and glass on harvesting equipment are protected and the operation has an SOP in place to address glass or plastic breakage on the equipment during harvest.

WATER USE

See the water use discussion in the Farm Review section.

TRANSPORTATION OF PRODUCE

Products that are transported in bulk from the field or from storage for further packing may be contaminated during this time. Steps should be taken to reduce the possible contamination by other vehicles on the roads, overhead contamination from overpasses, from birds or other means. Using tarps, enclosed trailers or other means to cover loads are examples of good practices. Products being moved in enclosed containers (boxes, cartons, etc.) would be considered covered if they are completely enclosed.

EMERGENCY CLEAN-UP PROCEDURES

The operation shall have a documented emergency clean-up procedure in the event accidental contamination occurs from glass/plastic breakage, chemicals, petroleum, or pesticides contaminating the crop. The procedure should include what will be done to contain the spill and to prevent additional contamination. As well as what will be done to clean it up and what will be done with contaminated product.

HOUSE PACKING FACILITY

This scope covers packinghouses located on or near crop production areas. This scope is not intended for repack operations or distribution operations which may custom pack product for retail or foodservice customers. These types of operations should use the Part 6 Wholesale Distribution Center/Terminal Warehouse section of the USDA GAP&GHP audit.

The main focuses of the House Packing Facility section of the audit are, water, the packing equipment, general housekeeping, worker health and personal hygiene, containers used for packing, and pest control. This scope of the audit can only be performed when the packinghouse is actively handling product. If the audit covers more than one commodity, it is not necessary to see every commodity being packed unless there are major differences in the packing process such as dry run product vs. product which uses a water flume, etc.

WATER USE IN PACKING FACILITY

Source water used in the packing of fresh fruits and vegetables must meet the requirements of the EPA Drinking Water Standard. Also water used to make ice used in the packinghouse must meet these requirements.

Municipal water supplies are regulated by law and are required to meet these requirements. However well water and surface water is subject to various uncontrollable influences and may or may not meet these requirements. The operation must provide documentation verifying the source water meets the EPA Drinking Water Standard requirements.

For commodities which are susceptible to water infiltration such as product with a stem scar; special attention needs to be given to the water temperature in the dump tank and flumes vs. the temperature of the product. Research has shown that a susceptible commodity which is placed in water colder than the pulp temperature of the commodity have a greater chance of internalizing the water and thus carrying any contamination into the product. Operations should refer to commodity specific recommendations or their state extension food safety specialist for more information regarding water infiltration.

TREATMENT OF PROCESSING WATER

Water used during the post-harvest handling of fruits and vegetables often involves a high degree of water-to-produce contact, and if untreated, may serve as a source of contamination or cross-contamination. Re-use of processing water may result in the build-up of microbial loads, including undesirable pathogens. Operations shall consider practices which will ensure and maintain water quality. Such practices may include:

- Monitoring of sanitation chemicals used to prevent cross contamination (i.e. chlorine and pH).
- Perform periodic water sampling and microbial testing.
- Change water as necessary to maintain sanitary conditions.
- Consider developing SOPs (standard operating procedures or sanitary operating plans), including water change schedules.
- For all processes that use water: clean and sanitize water contact surfaces, such as dump tanks, flumes, wash tanks, and hydro coolers, as often as necessary to ensure appropriate water quality.
- Install backflow devices and legal air gaps, as needed, to prevent contamination of clean water with potentially contaminated water (such as between potable water fill lines and dump tank drain lines).
- Routinely inspect and maintain equipment designed to assist in maintaining water quality, such as chlorine injectors, filtration systems, and backflow devices, to ensure efficient operation.

SANITATION PROGRAM/GENERAL HOUSEKEEPING

Operations with poor sanitation in the packing environment may significantly increase the risk of contaminating fresh produce and water used on produce. Pathogenic microorganisms may be found on the floors and in the drains in the packing facility and on the surfaces of sorting, grading, and packing equipment. Any of these surfaces could be a potential source of microbial contamination.

Operations shall employ good sanitation practices as a standard operating procedure to maintain control throughout the packing operation. Packing areas should be cleaned minimally at the end of each day. As necessary, clean and sanitize the washing, grading, sorting, and the packing lines to reduce the potential for microbial contamination of fresh produce. The operation shall develop and implement a general sanitation schedule which addresses the cleaning and sanitizing of the packinghouse operation including:

- Food contact surfaces
- Pipes, ducts, fans, and ceilings which are over product flow zones
- Catwalks over food contact surfaces

Ice making facilities may be located on the site of the operation or may be contracted out and supplied by another operation. In either case, the facility must provide records that indicate there is a regular schedule to sanitize the ice production and storage facility and any means of transportation to reduce the microbial population. This would include augers, conveyors and shovels used to transport the ice from one part of the facility to another.

The operation shall use food grade approved lubricants in areas where lubricating agents may come into contact with produce.

The operation shall have a procedure which identifies how product that spilled or comes in contact with the floor is handled. Spilled product that comes in contact with the floor can become contaminated and should not be used without considering a corrective action such as washing /sanitizing or disposing of the product. Commodity specific guidelines offer recommendations regarding the handling of spilled product and should be incorporated into the operation's food safety program.

WORKER HEALTH AND HYGEINE

The questions in the General Section portion of the audit related to health and hygiene are applicable to the House Packing Facility section of the audit as well. In addition, the House Packing Facility has several questions related to worker health and hygiene which are specific to these types of operations.

The operation shall evaluate and develop a hair/beard net policy which is appropriate for the facility. Hair nets and beard nets are worn in order to keep stray hair from entering the food and food containers being packed. In addition, wearing of hairnets when the hair is very long reduces the risk of catching hair in machinery.

The operation shall evaluate and develop a jewelry policy. Jewelry can be both a physical safety and a food safety hazard. Jewelry may fall into the food item or the container or may get caught on machinery and injure the worker.

The operation shall state the hairnet and jewelry policy in the food safety plan even if the policy states that no hairnets or restrictions on jewelry are required.

CONTAINERS

Operations should develop policies and procedures outlining only the use of new or sanitized containers which are clean and in good condition when packing the product. Policies and procedures shall require pallets and packing containers are properly stored to reduce the risk of contamination from pests, rodents, dirt, water, etc. Operation shall outline a sanitation schedule for reusable plastic containers used to pack product.

PEST CONTROL

All packing and storage facilities shall establish a pest control program to reduce the risk of contamination by rodents and other animals, including pets. This program shall include regular and frequent monitoring to accurately assess the program's effectiveness. The pest control program can be either performed by an employee trained to perform pest control or a contracted pest control company.

The operation must maintain a pest control log which records inspection dates, inspection reports, and procedures implemented to eliminate pest infestations. If using a contracted company, they generally supply the records of activity. All traps and bait stations will be marked and flagged by numbers or some type of coding system and recorded on a map which shows the location of such bait stations and traps.

All bait stations containing poison attractants must be located outside the facility. Traps or other non-poison methods should be the only control program located within a structure.

STORAGE AND TRANSPORTATION

This scope covers storage and transportation facilities located on or near crop production areas. This would include storage and transportation areas co-located with a packinghouse or stand alone storage facilities used on or near farms such as potato storage sheds or controlled atmosphere facilities. This scope is not intended for repack operations or distribution operations which may custom pack product for retail or foodservice customers. These types of operations should use the Part 6 Wholesale Distribution Center/Terminal Warehouse section of the USDA GAP&GHP audit.

The topics of worker health and hygiene, water quality, general sanitation & housekeeping and pest control are addressed in the House Packing section of this User's Guide (pages 17-20) and are applicable to this section of the audit as well.

MECHANICAL EQUIPMENT

Any equipment used in the storage facility shall be clean and properly maintained to prevent leaking fluids that could potentially contaminate the product. Loose or broken parts must be repaired to prevent foreign objects from contaminating the product. Any equipment or portions of equipment that directly touches raw product must be maintained so as to not contaminate the product.

ICE AND REFRIGERATION

The operation shall use water which meets the EPA Drinking Water Standards when making ice used for cooling or which comes in contact with the product. Ice or cold water (hydro-cooling) is often used by some commodity packers to reduce product temperature. The operation shall provide records which verify the source water used to make ice meets these requirements, including any ice which is purchased from an outside vendor.

The operation shall develop and implement a procedure for monitoring climate controlled rooms for temperature and keeping a record of temperatures. Climate control systems must be working and thermometers used in cold storage areas and for determining product temperatures should be regularly checked for accuracy and operators must maintain records to validate this procedure.

TRANSPORTATION AND LOADING

The operation shall develop an SOP which outlines the procedures for inspecting transportation conveyances for cleanliness, odors, and debris before the loading with product. The SOP should also include policies for not loading produce with potentially contaminating products such as raw meat or chemicals and policies to ensure adequate transport temperatures and should develop a written policy for transporters and conveyances to maintain specified transit temperatures. Records documenting adherence to the SOPs shall be maintained.

WHOLESALE DISTRIBUTION CENTER/ TERMINAL WAREHOUSE

Even though the *“Guide to Minimize Microbial Food Safety Hazards for Fresh Fruit and Vegetables”* is typically applied to farming operations, it is applicable throughout the marketing chain. Organizations and personnel within the wholesale distribution chain are just as responsible for food safety as organizations and personnel at the farm level. Part 6 of the USDA GAP&GHP audit focuses specifically on the wholesale end of the food distribution chain, and utilizes many of the same principles applied to packinghouses and storage & transportation facilities.

RECEIVING

Operations shall develop a formally approved supplier program for all incoming products which includes verification the supplier has undergone a 3rd party GAP&GHP audit.

The operation shall develop an SOP which outlines the procedures to verify incoming conveyances are checked for cleanliness, objectionable odors, and other potentially contaminating factors prior to accepting a load. The SOP shall also address procedures for monitoring the temperature of incoming loads and verify they meet any temperature requirements specified on the bill of lading or other requirements. The operation shall also have a policy on how to handle loads which do not meet the temperature requirements.

SANITATION PROGRAM/GENERAL HOUSEKEEPING

Operations with poor sanitation in the packing environment may significantly increase the risk of contaminating fresh produce and water used on produce. Pathogenic microorganisms may be found on the floors and in the drains in the packing facility and on the surfaces of sorting, grading, and packing equipment. Without good sanitation practices, any of these surfaces could be a potential source of microbial contamination.

Operations shall employ good sanitation practices as a standard operating procedure to maintain control throughout the packing operation. Packing areas should be cleaned at the end of each day. As necessary, clean and sanitize the washing, grading, sorting, and the packing lines to reduce the potential for microbial contamination of fresh produce. The operation shall develop and implement a general sanitation schedule which addresses the cleaning and sanitizing of the packinghouse operation including:

- Food contact surfaces
- Pipes, ducts, fans, and ceilings which are over product flow zones
- Catwalks over food contact surfaces

Ice making facilities may be located on the site of the operation or may be contracted out and supplied by another operation. In either case, the facility must provide records that indicate there is a regular schedule to sanitize the ice production and storage facility as well as any means of transportation to reduce the microbial population. This would include augers, conveyors and shovels used to transport the ice from one part of the facility to another.

The operation shall use food grade approved lubricants in areas where lubricating agents may come into contact with produce.

The operation shall have a procedure which identifies how product that spilled or comes in contact with the floor is handled. Spilled product that comes in contact with the floor can become contaminated and should not be used without considering a corrective action such as washing/sanitizing or disposing of the product.

WATER USE IN PACKING FACILITY

Source water used in the packing of fresh fruits and vegetables must meet the requirements of the EPA Drinking Water Standard. Water used to make ice used in the packinghouse must also meet these requirements.

Municipal water supplies are regulated by law and are required to meet these requirements. However, well water and surface water is subject to various uncontrollable influences and may or may not meet these requirements. The operation must provide documentation verifying the source water meets the EPA Drinking Water Standard requirements.

For commodities which are susceptible to water infiltration such as produce with a stem scar, special attention needs to be given to the water temperature in the dump tank and flumes vs. the temperature of the product. Research has shown that a susceptible commodity which is placed in water colder than the pulp temperature of the commodity have a greater chance of internalizing the water and thus carrying any contamination into the product. Operations should refer to commodity specific recommendations or their state extension food safety specialist for more information regarding water infiltration.

TREATMENT OF PROCESSING WATER

If applicable to the facility the operation shall verify that water used for processing is treated and monitored including:

- Monitoring of sanitation chemicals used to prevent cross contamination (i.e. chlorine and pH).
- Perform periodic water sampling and microbial testing.
- Change water as necessary to maintain sanitary conditions.
- Consider developing SOPs (standard operating procedures or sanitary operating plans), including water change schedules.
- For all processes that use water: clean and sanitize water contact surfaces, such as dump tanks, flumes, wash tanks, and hydro coolers, as often as necessary to ensure the safety of produce.
- Install backflow devices and legal air gaps, as needed, to prevent contamination of clean water with potentially contaminated water (such as between potable water fill lines and dump tank drain lines).
- Routinely inspect and maintain equipment designed to assist in maintaining water quality, such as chlorine injectors, filtration systems, and backflow devices, to ensure efficient operation.

STORAGE FACILITY/TEMPERATURE CONTROL

The operation shall have procedures in place to verify the refrigeration systems are working properly and are monitoring the temperatures of climate controlled rooms. The operation must have temperature recording logs available for review. Thermometers used in cold storage areas and for determining product temperatures

should be regularly checked for accuracy and operators must maintain records to validate this procedure.

CONTAINERS

Operations should develop policies and procedures outlining only the use of new or sanitized containers which are clean and in good condition when packing the product. Policies and procedures shall require pallets and packing containers are properly stored to reduce the risk of contamination from pests, rodents, dirt, water, etc. Operation shall outline a sanitation schedule for reusable plastic containers used to pack product.

MECHANICAL EQUIPMENT

Any equipment used in the storage facility shall be clean and properly maintained to prevent leaking fluids that could potentially contaminate the product. Also loose or broken parts must be repaired to prevent foreign objects from contaminating the product. Any equipment or portions of equipment that directly touches raw product must be maintained so as to not contaminate the product.

PREVENTIVE FOOD DEFENSE PROCEDURES

This section of the USDA GAP&GHP audit covers an operations food defense program. Food Defense is the protection of the food supply by **intentional contamination** by biological, chemical, or physical means by an aggressor. In contrast, the previous sections of the USDA GAP&GHP audit dealt with food safety which is the protection of food products from **unintentional** contamination from biological, chemical, or physical means.

FOOD DEFENSE PLAN

The operation shall develop and implement a documented food defense plan. Similar to a food safety plan, a food defense plan includes a company Food Defense Manual, containing the company's published SOP's and/or documentation. It will also contain information or references pertaining to internal or self audits of the program. Other similar documentation may also be applicable and acceptable if it indicates that a formally established program is in place.

The Food Defense plan shall indicate that there is a person in the operation that has implemented and will oversee the food defense program.

PERSONNEL

Each company should designate a contact person who is responsible for overseeing the plan. This person should be the point of contact for employees to point out potential security problems or issues. This person can also designate another person (for example, a shift supervisor) who can be the contact person for employees.

Food defense training shall be provided for all employees and should cover potential threats and vulnerabilities of the food supply and how they apply to the produce industry. Training should include who employees should contact if they observe a potential food defense issue. Records showing training instructions and training documents that each employee has signed should be available.

The food security plan should address access procedures to identify who has admittance to sensitive areas of the facility. This includes verifying the identity of visitors to the facility and the purpose for the visit. Check in procedures can vary from a formal sign in/sign out procedure in enclosed facilities to visitors checking in with the owner/manager (or designated person) of a small operation.

The operation should determine if any staff should have limited access to certain areas of the operation. The food security plan should address those jobs and the details of how staff will be limited to areas of the operation that are related to their job function, and to general access areas (break rooms, locker rooms, etc.). This type of scenario usually applies to larger packing house facilities or wholesale warehouses. In the case of small operations that only have a limited number of employees who perform all functions, this may not apply. Limiting access to packing/storage areas by unauthorized personnel is one of the most important procedures that can be implemented to reduce the risk of intentional contamination.

Visitors should be accompanied by an employee. A facility may designate exceptions to this for frequent visitors to the facility such as USDA inspectors, health department inspectors, the pest control contractor, etc., provided a documented list of exempted people is maintained.

All vehicles should be subject to inspection to look for any obvious sources of contamination. Documentation that vehicles entering the facility are being searched or that vehicles are subject to search should be available for review.

A policy should be in place that prohibits workers from bringing personal items into the production, handling, or storage areas. This reduces the possibility of an insider from contaminating product. Many packing facilities will allow workers to bring water to the packing line. This is an acceptable practice as long as the water is supplied by the facility and is not brought from outside sources.

Employees should not be allowed to loiter around the grounds and facility after their work hours, especially in sensitive areas of the operation. A work schedule outlining employee's hours and area the employee is assigned to work should be available to all management.

FACILITY PROCEDURES

The Operation shall develop procedures for the following areas:

- Procedure for controlling all items which identify a person as an employee of the company and requiring those items to be returned to the company upon completion of employment. If an employee does not turn over these items, there

is a procedure in place for management/security to be notified that the employee is not allowed access to the facility.

- Policy or Procedure to limit access to the company's computer network so that sensitive information is only accessed by authorized personnel.
- Policy or procedure for verifying the employment eligibility of all new hires in accordance with the Immigration and Nationality Act. In addition, the operation should outline what level of background checks will be performed. This can be a procedure as simple as a reference check, or more detailed such as a credit check for financial personnel. Operations that employ farm workers through an outside contractor should stipulate in their contract that the contractor perform a minimum level of background checks as well.
- Procedure for scheduled checks of the operation. On a farm, critical areas such as the storage barns, pesticide storage areas, and any product storage areas should be checked routinely. For packing sheds and wholesale warehouses that have a more permanent structure, the entire facility should be routinely checked. Including development of a checklist to verify the points of entry into buildings, either on the farm or packing house/wholesale warehouse.

KEY/ENTRANCE ACCOUNTABILITY

There shall be an accountability log showing who is in possession of any keys to enter the facility. Lost keys are documented on the accountability log, and steps are taken if keys to sensitive areas such as chemical storage areas are reported lost or stolen. These steps may include changing the lock or adding additional security measures.

DELIVERIES

The operation shall develop a policy which outlines delivery schedules and the policy for rejecting loads. The policy should include a list of criteria for why the product doesn't meet specified requirements as well as food safety requirements such as evidence of container tampering, evidence of suspicious foreign objects, etc. The receiving department/facility shall never accept incoming product that is from an unknown source. All deliveries should be listed on the delivery schedule, and only deliveries from that schedule should be accepted. The policy should address returned product and outline the returned product should be inspected for obvious signs of tampering or intentional contamination.

SEPARATION OF PRODUCTS

USDA Commodity Procurement purchases require that all domestic products be segregated from any foreign product. Additionally, because foreign product has the potential to be targeted for intentional contamination and shipped to the United States, it should be kept segregated from domestic product.

ALLERGENS

Products that are known allergens, such as peanuts should be segregated for several reasons. First to avoid inadvertent cross contamination with other products, and secondly to minimize the potential for an insider to simply “reach across the aisle” and purposely contaminate other product stored in the same area.

USDA GAP&GHP PROGRAM AUDIT SCORING

The USDA GAP&GHP audit utilizes a scoring system. Each question is given a score of 5, 10 or 15 points and is weighted depending on the relative risk associated with the question. There are no partial points given for any question, each question is either given the total points assigned to the question or zero points.

The USDA GAP&GHP Program requirements state that a minimum of 80% must be scored on each scope of the audit conducted in order to “pass” the audit. In addition no “automatic unsatisfactory” conditions can be present.

AUTOMATIC UNSATISFACTORY CONDITION

In addition to the scoring guideline shown above, there are a set of overarching conditions, which if observed, will result in the issuance of an “automatic unsatisfactory” score on the audit. These conditions are:

- An immediate food safety risk is present when produce is grown, processed, packed or held under conditions that promote or cause the produce to become contaminated.
- The presence or evidence of rodents, an excessive amount of insects or other pests in the production area during packing, processing or storage.
- Observation of employee practices (personal or hygienic) that jeopardize or may jeopardize the safety of the produce.
- Falsification of records.
- Answering of Questions P1 or P2 as “NO”.

Commodity specific audits performed by USDA auditors follow the same general guidelines as outlined above for automatic unsatisfactory conditions; however, they may refer to them in different terms such as “major deficiency” or “flagrant violation”. Refer to the commodity specific audit programs for the policies regarding these conditions.

In addition, if an immediate food safety risk which results in product contamination, the auditor may be required to report the operation to the applicable state Public Health Agency or the Food and Drug Administration.

POST AUDIT ACTIVITIES

Once an operation has successfully met the requirements of the USDA GAP&GHP program, it will receive a USDA certificate and have their information listed on the USDA website. The certificate is good for one year from the date of the initial audit, and the operations information will remain on the USDA website for one year unless the operation fails an unannounced verification audit.

APPEALS, COMPLAINTS & DISPUTES

Operations have the ability to appeal, dispute or lodge a complaint if they so desire. Operations with issues regarding an audit or auditor(s), should refer to the following list for assistance with the process.

- **APPEAL**: A formal complaint contesting the results or findings of the audit brought before the Branch by applicants or other parties.
- **COMPLAINT**: Discontent or unhappiness about a situation, interpretation, or performance of an audit, auditor(s), and/or policy brought before the Branch by applicants or other parties.
- **DISPUTE**: Disagreement or argument about a situation, interpretation or performance of an audit, auditor(s), and/or policy brought before the Branch by applicants or other parties.

If an operation decides to appeal or dispute an audit, there are certain steps that must be followed. The formal request for an appeal must be in writing on company letterhead from the company or person requesting the appeal. Information included in the request should be the date of the audit, location (if different from corporate office), sections on the original audit being appealed, and the specific item(s) being under dispute. Appeals, complaints and Disputes must be submitted to the Fresh Products Branch within three calendar days from the date the audit was performed.

All GAP/GHP audit appeals are performed by the Audit Review Board (ARB), who meet as needed to review all GAP&GHP audit appeals. The ARB has the authority to sustain or reverse the appeal. The results of the appeal will be provided by the ARB to all parties in the appeal process within 14 calendar days. Copies of the appeal results become part of the audit record.

Complaints regarding auditors shall be directed to the auditor's supervisor. Complaints regarding Branch policies and procedures shall be directed to the Audit Management Section.

Additional Resources

Establishing, implementing, and maintaining an effective food safety plan involves the evaluation of many processes. The USDA GAP&GHP website www.ams.usda.gov/gapghp provides links to many resources. State and Federal Agencies, University and Cooperative Extension Programs, Trade and Commodity Associations offer additional guidance for food safety planning.

APPENDIX I – FV-237A AUDIT REQUEST

FORM APPROVED BY OMB No. 0581-0125

	UNITED STATES DEPARTMENT OF AGRICULTURE Agricultural Marketing Service Fruit and Vegetable Programs Fresh Products Branch	REQUEST FOR AUDIT SERVICES	
	(This is the only acceptable form for fax or electronic submission to USDA for audit requests)		
NOTE: Fill in all appropriate blocks. Requested services may be delayed because of incomplete information. Type of service requested must be selected below.			
DATE OF REQUEST: _____		ANTICIPATED DATE OF AUDIT: _____	
AUDITEE INFORMATION		FARM/ FACILITY INFORMATION	
Company Name:	_____	Location:	_____
Street Address:	_____		
City, State & Zip:	_____	Total Acres / Total Sq Feet to be audited:	_____
Phone Number:	_____		
Contact Person:	_____		
APPLICANT INFORMATION		COMMODITIES TO BE COVERED BY AUDIT (Please List)	
Company Name:	_____	_____ _____ _____ _____ _____	
Phone Number:	_____		
Fax Number:	_____		
E-mail:	_____		
Contact Person:	_____		
TYPE OF AUDIT SERVICES REQUESTED			
Type of Audit(s) Requested (Please choose at least one)		Scope of GAP & GHP Audit (Please choose all that apply)	
<input type="checkbox"/> Good Agricultural Practices & Good Handling Practices (GAP&GHP) (Select Audit Scopes)		<input type="checkbox"/> Part 1 – Farm Review	
<input type="checkbox"/> Mushroom Specific GAP Audit (M-GAP)		<input type="checkbox"/> Part 2 – Field Harvest & Field Packing Activities	
<input type="checkbox"/> Tomato Audit Protocol (T-GAP)		<input type="checkbox"/> Part 3 – House Packing Facility	
<input type="checkbox"/> Leafy Greens Audit (LGMA)		<input type="checkbox"/> Part 4 – Storage & Transportation	
<input type="checkbox"/> Identity Preservation Audit (IP)		<input type="checkbox"/> Part 6 – Wholesale Distribution Center / Terminal Warehouse	
<input type="checkbox"/> Other, Specify: _____		<input type="checkbox"/> Part 7 – Preventative Food Defense Procedures	
ADDITIONAL REMARKS			
To download a copy of the USDA Good Agricultural Practices & Good Handling Practices audit checklist, please visit the USDA website at http://www.ams.usda.gov/gapghp .			
Once a request has been received, a USDA representative will make contact within 48 hours of receipt to schedule the audit.			
<small>According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0581-0125. The time required to complete this information collection is estimated to average .02 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.</small>			
<small>The U.S. Department of Agriculture (USDA) prohibits discrimination in all its programs and activities on the basis of race, color, national origin, age, disability, and where applicable, sex, marital status, familial status, parental status, religion, sexual orientation, genetic information, political beliefs, reprisal or because all or part of an individual's income is derived from any public assistance program. (Not all prohibited bases apply to all programs.) Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotape, etc.) should contact USDA's TARGET Center at (202)720-2600 (voice and TDD). To file a complaint of discrimination, write to USDA, Director, Office of Civil Rights, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, or call (800)795-3272 (voice) or (202)720-6392 (TDD). USDA is an equal opportunity provider and employer.</small>			
FV-237A (10-10)			

APPENDIX II – FV-651 PARTICIPANT AGREEMENT

	UNITED STATES DEPARTMENT OF AGRICULTURE Agricultural Marketing Service Fruit and Vegetable Programs Fresh Products Branch	FORM APPROVED BY OMB No. 0581-0125 Good Agricultural Practice & Good Handling Practices Audit Program (GAP&GHP) Identity Preservation Program (IP) Partners in Quality Audit Program (PIQ) & Other Audit Programs
AGREEMENT FOR PARTICIPATION IN AUDIT VERIFICATION PROGRAMS		
Company Information		
I _____ a duly authorized representative of (Insert Name)		
_____ (Name of Company)		_____ (Street Address, City, State, and Zip Code)
hereinafter referred to as the applicant, do hereby agree to be audited under the a voluntary USDA, AMS, Fresh Products Branch audit program. The audit shall include verification of the company's farm(s), packing facilities, storage facilities, wholesale distribution centers or other locations as applicable to the audit scope(s).		
1. The applicant agrees that with respect to:		
<p>a. Laws, Regulation, Statutes - To conform with all applicable Federal, State, and local government laws, regulations, or statutes, including, but not limited to: Regulations Governing Inspection and Certification of Fruits and Vegetables and Related Products (7 CFR, Part 52), any other pertinent regulations, and any such Instructions covering inspection and certification of the products and verification of the processes as may be issued by AMS.</p> <p>b. Audit Request - To contact and schedule the audit with the appropriate federal or federal-state inspection office (using the FV-237A form). The request for the initial audit will be made no later than two (2) weeks prior to the end of the growing/harvesting/packing season.</p> <p>c. Records - To maintain all records required by the specific audit program including, but not limited to, quality manual, food safety manual, water test results, employee training records, manure use records, laboratory testing results and other records as required by the quality manual, food safety manual or specific audit program requirements. The applicant shall make these records available to USDA federal and/or federal-state auditors.</p> <p>d. Access to Facilities - To grant permission for AMS authorized personnel to enter any and all farms and/or facilities covered by the specific audit program for the purposes of conducting the audit. This includes the initial audit and any unannounced audits as may be required by the program.</p> <p>e. Payment - To pay by credit card, check, draft, or money order drawn to the order of the appropriate federal or federal-state agency for the services covered herein on or before the due date specified on the billing statement. Charges for GAP&GHP audits include, but are not limited to, the audit fee as listed in the fee schedule or Federal Register and travel expenses for the initial audit and any unannounced audits as may be required by the program.</p>		
2. AMS agrees that with respect to:		
<p>a. Perform Audit – To provide objective third-party verification of the applicant's specific audit program using internationally recognized audit principles.</p> <p>b. Opening & Exit Interviews - To discuss the audit prior to and report the results and observations with the applicant after each audit and provide a copy of the completed audit report or checklist.</p> <p>c. Reports - To issue to the applicant reports of all audits and evaluations of the applicant's specific audit program and provide written notification of any deficiencies found, if any.</p> <p>d. Confidentiality - To consider and treat any trade secrets or confidential information as proprietary and confidential. To consider any records and related information provided to AMS as information that is voluntarily submitted to AMS because of their participation in the specific audit program.</p> <p>e. Issuance of Certificate, Posting and Sharing Audit Results - To issue a certificate to the applicant and to post audit results to the USDA website, (with the exception of the Preventative Food Defense Procedures scope), only when the applicant receives at least the minimum passing score for each scope being audited. To provide the specific applicant checklist and results of individual questions to other parties only at the written request of the applicant. NOTE: Reports containing a compilation of generic audit information may be shared with the Food and Drug Administration. Any personal information linking the audit results to the auditee shall be redacted prior to issuance.</p>		

3. It is mutually agreed that with respect to:

- a. **Length of Service** - That the audit results for GAP&GHP audits are valid for one year from the date of the initial audit, provided that at least the minimum score is achieved on both the initial audit and any unannounced audits that may be required by the program. For all other audit programs, the length of service is outlined in the specific audit program policy guide. This agreement shall remain in effect for the length of time the auditee remains a participant in the specific audit program.
- b. **Maintaining Certification** - That a company's information will only remain on the USDA website if any and all unannounced audits show satisfactory adherence to the program. If the minimum passing score is not achieved, the company's information will be removed from the website until a follow-up audit is conducted by AMS verifying that effective corrective actions have been taken and the company attains the minimum score on all appropriate scopes of the audit.

Approved By:

Should AMS personnel be at a facility for other purposes and notice issues that would jeopardize the company's standing on the specific audit program, AMS has the obligation to bring this to the attention of the company representative and, depending on the severity, withdraw certification.

Name of Applicant (Print): _____ **Title:** _____

Signature: _____ **Date:** _____

USDA Agricultural Marketing Service, Fruit & Vegetable Programs/ Federal or Federal-State Inspection Program Supervisor

Name of Representative (Print): _____ **Title:** _____

Signature: _____ **Date:** _____

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0581-0125. The time required to complete this information collection is estimated average 8.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

The U.S. Department of Agriculture (USDA) prohibits discrimination in all its programs and activities on the basis of race, color, national origin, age, disability, and where applicable, sex, marital status, familial status, parental status, religion, sexual orientation, genetic information, political beliefs, reprisal or because all or part of an individual's income is derived from any public assistance program. (Not all prohibited bases apply to all programs.) Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotape, etc.) should contact USDA's TARGET Center at (202)720-2600 (voice and TDD). To file a complaint of discrimination, write to USDA, Director, Office of Civil Rights, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, or call (800)795-3272 (voice) or (202)720-6382 (TDD). USDA is an equal opportunity provider and employer.

Insert “Audit Checklist” Divider Here

GAP Audit Checklist Information

Farm information

Farm name: _____

Owner's name: _____

Contact person: _____

Farm address: _____

Mailing address: _____

Contact person phone: _____

GAP and GHP training:

Participated in GAP and/or GHP training: yes or no

If yes, describe*

**examples:* Cooperative Extension Service training, professional training or seminars

Farm maps and descriptions:

- Farm map(s) of all potato growing locations must be provided:
Maps are located under the "Maps" tab of this manual
- A legal description of each field is provided: yes or no
If yes, these descriptions are located under the "Maps" tab of this manual
- On-farm potato storage facility maps are provided: yes or no or not applicable.
Must be provided if auditing Storage and Transportation-(Part 4).
If yes, these maps are located under the "Maps" tab
- Number of fields in potatoes:

- Are any fields excluded from this audit?: yes or no

If yes, list names and acreage _____

- List names of fields and varieties to be audited:

- Total number of potato acreage:_____

- Total farm acreage (including non-potato crops):_____

- Is any product co-mingled (eg. potatoes from different producers) in a storage?

Yes No

If yes, explain how designation between producers' crop is made in the storage facility.

- List other crops grown (excluding potatoes):

Insert ‘Farm SOP’ Divider Here

STANDARD OPERATING PROCEDURE FOR GOOD AGRICULTURAL PRACTICES

Audit # reference (P, G, 1, 2, 4)
Record # reference (R#)

_____ has designated _____ P1, P2
(Farm name) (Employee name)

to implement and oversee a food safety program that incorporates GAP and/or GHP for this farm.

Traceability

- A traceability program has been established and successfully tested with a “mock recall”. Records of the traceability program can be found in the Records and Documentation section. If applicable description of co-mingling is needed it can be found in the Audit Checklist Information section. G1,G2
R#1

Worker Health and Hygiene

- Potable water is available to all workers. Documentation is attached. G3, R#2
- All employees have been trained and are required to follow proper sanitation and hygiene practices. Employee name, date of training, and training method are documented. An employee signed policy form is attached. Follow-up training will be provided if necessary. G4,G5,
G7
R#3 R#4
- Readily understandable signs are posted in appropriate areas to instruct employees and visitors to wash their hands before beginning or returning to work (including all breaks, lunch and restroom use), or when their hands have been contaminated. G7,G8
- Readily understandable signs are posted in appropriate areas to instruct employees and visitors to follow proper sanitation and hygiene. G4, G6,
- All toilet/restroom/field sanitation are serviced and cleaned on a scheduled basis. They are properly supplied with single use paper towel, toilet paper, and hand soap or anti-bacterial soap and potable water for hand washing. G9
G10
R#5
- Eating, drinking, chewing gum and tobacco use are confined to designated areas separate from where potatoes are handled. Designated areas include _____. Bottled water is allowed provided it is stored in closed plastic containers away from the product flow when not being used. G11

Worker Health and Hygiene (continued)

- Workers with flu-like symptoms or open wounds, or infectious conditions are prohibited from handling potatoes. G12
- A written policy is in place whereby potatoes that have come in contact with blood or other body fluids will be disposed using the most appropriate method for the situation (e.g. buried, burned, etc.). Equipment surfaces that have come into contact with blood or other body fluids will be cleaned and disinfected with bleach or other safe disinfectant. G13
- First aid kits are identified, checked and restocked on a regular basis. All employees are instructed to seek prompt treatment with clean first aid supplies for cuts, abrasions, and other injuries. Workers are instructed to report any injuries to their supervisors and will be documented in the illness/injury reporting log. G14
- Any pesticide, fertilizer, or nutrient applied in the production of the potato crop will be documented and kept on file. Company personnel applying regulated materials must have name and pesticide license recorded and on file. G15
R#6

Farm Review

Water Usage

- The farm operator is knowledgeable of the irrigation water source and application method(s). 1-1,1-2
- Water quality is documented to be adequate for irrigation, chemical application and fertigation method. 1-3,1-4
R#7
- Measures are used to restrict irrigation water sources from livestock, wildlife, and other potential pollution sources as needed. 1-5
1-11

Sewage Treatment

- The farm sewage treatment system/septic system is functioning properly and there is no evidence of leaking or runoff. 1-6
- There is no municipal/commercial sewage treatment facility or waste material landfill adjacent to the farm. 1-7

Animals/Wildlife/Livestock

- Controls are in place to decrease contamination of agricultural water and soil from other farm or animal operations. 1-8
- Manure lagoons located near or adjacent to potato production areas are maintained to prevent leaking or overflowing, or measures have been taken to stop runoff from contaminating the potato production areas. 1-9
1-10
- All reasonable effort is made to keep domestic and wild animals away from water used for irrigation and the potato production area. Presence or non-presence is monitored and documented. 1-12
1-13
R#8

Manure and Municipal Biosolids

- A. The farm operation will choose one of the following:
 - A. This farming operation applies raw manure or a combination of raw and composted manure as a soil amendment, complete 1-14 through 1-17.
 - B. This farming operation applies only composted manure/treated municipal biosolids as a soil amendment, complete 1-18 through 1-21.

Farm Review (continued)

- C. If this farming operation applies no manure or municipal biosolids of any kind, go to 1-22. This farm declines to use raw animal manure, composted manure or municipal biosolids, skip sections 1-14 to 1-21

Option A: Raw Manure

- A. If this farming operation applies raw manure or a combination of raw and composted manure as a soil amendment it is incorporated immediately at least 2 weeks prior to planting or a minimum of 120 days prior to harvest. 1-14
R#9
- A. Raw manure is not used on commodities that are harvested within 120 days of planting. 1-15
R#9
- A. If a combination of raw and treated manure is used, the treated manure is properly treated, composted or exposed to reduce the expected levels of pathogens. 1-16
R#10
- A. Manure is properly stored prior to use. 1-17

Option B: Composted Manure

- B. If farm uses only composted manure and/or treated biosolids as a soil amendment, it will be properly treated, composted, or exposed to environmental conditions that would lower the expected level of pathogens. 1-18
1-19
1-21
Aged manure is not considered compost. Proper composting methods are described in the SOP appendix. R#10
A#1
- B. Composted manure and/or treated biosolids are properly stored and are protected to minimize recontamination. 1-20

Option C: No Manure/Biosolids

- C. This farming operation applies no manure or municipal biosolids of any kind. 1-22

Soils

- All attempts have been made to acquire previous land use history to minimize the risk of produce contamination. If previous land use history indicates a potential for contamination action will be made to mitigate the contamination or the field will not be used for crop production. If flooding occurred in the crop production areas, soils are tested for potential microbial hazards 1-23
1-24
1-25
R#11
A#5

Traceability

- Each field (production area) is coded or identified to enable traceability in case of a recall 1-26
R#12

Field Harvest and Field Packing Activities

Worker Sanitation and Hygiene

- A pre-harvest assessment is made with risks and possible sources of contamination recorded and assessed. 2-1
R#12
- This farming operation will comply with all applicable state and/or federal regulations dictating the number, condition, and placement of portable field sanitation units. If the number of employees does not require a portable field sanitation unit, access to a clean toilet facility is readily available for all employees. 2-2
2-3
- Portable field sanitation units are located such that they minimize the risk for product contamination and yet are easily accessible for service, clean up and response teams. If a portable toilet is tipped over, damaged or leaking it will be fixed or replaced and contaminated soil around it will be removed. 2-4
2-5

Field Harvesting and Transportation

- All harvesting containers (including bulk hauling vehicles) as well as hand harvesting implements that come in direct contact with harvested potatoes are cleaned and/or sanitized prior to use and kept as clean as practical. 2-6
2-7
R#13
- All containers, equipment and/or machinery will be in good repair and any damaged containers or equipment will be properly repaired or disposed. 2-8
2-9
- Harvesting equipment containing light bulbs and/or glass will be protected to avoid produce or field contamination in case of breakage. 2-10
- If there is a glass, plastic breakage or any other source of contamination (chemical, petroleum, pesticide) during the harvesting operation the following action will be implemented 2-11
2-12
R#14
 - Supervisor is contacted
 - Potatoes contaminated will be disposed of and field area avoided
 - Equipment will be cleaned and inspected after contamination.

Field Harvest and Field Packing Activities (continued)

- This farming operation instructs all employees to inspect and remove foreign objects such as glass, golf balls, metal, rocks, or other dangerous/toxic items. Other means to remove potential contaminants may include use of specialized equipment. 2-13
- All harvesting containers will be used solely for the carrying or storage of the intended crop (potatoes) and non-produce items will not be allowed in these containers during the harvest season. 2-14
- No water is applied to harvested potatoes in the field or on hauling equipment 2-15
- Manual and mechanical effort will be made to remove excessive soil and/or mud from harvested potatoes and/or containers during harvest. 2-16
- Transportation equipment used to move potatoes from field to storage areas or storage areas to processing plant which comes into contact with product is clean, in good repair and covered. To achieve points on question 2-18 all loads must be covered. 2-17
2-18
- Product moving out of the field is coded or identifiable to enable traceability. 2-21
R#15 is used for direct trucking to packing shed or processor and also to a storage facility. R#15

Storage and Transportation

Product, Containers and Pallets

- The storage facility is cleaned and maintained in an orderly manner. Storage rooms, buildings and/or facilities are maintained and sufficiently sealed to protect from external contamination and floors are reasonably clear of debris and standing water. Pallets, pallet boxes, totes, bags, bins, cellars, storage rooms, etc., are clean, and inspected to not contribute foreign material to the product. All attempts are made to protect these containers or areas from contamination (birds, rodents and other pests, etc.). 4-1 thru 4-5 4-8 4-9 R#16
- If potatoes need to be stored outside they are covered and protected from contamination. 4-10
- Non-food grade substances such as paints, lubricants, pesticides, etc., will not be stored in close proximity to the harvested potatoes. 4-11
- All mechanical equipment used within the storage facility is clean and maintained to prevent contamination of the harvested potatoes. 4-12 R#16

Pest Control

- There is an established pest control program for the facility that includes measures to exclude animals or pests from storage facilities. Service reports for the program are available for review. A description of the program is in the SOP appendix. Maps of rodent bait and trap locations are in the map section. 4-13 4-14 4-15 R#17 A#2
- The storage facility is well maintained to minimize major cracks and crevices. 4-16

Ice and Refrigeration

- If cooling water or ice is necessary it must be potable. Manufacturing, storage and transportation facilities used in making and delivering ice used for cooling the product have been sanitized. See Non-required documentation section if record is needed. 4-17 4-18
- A floor plan/map of each storage facility is located in the map section. Refrigeration system is working properly and storage temperature logs are maintained. Thermometer(s) are calibrated and records are available. A calibration method is available in the SOP Appendix. Refrigeration equipment condensation or iced product does not come in contact with potatoes. 4-19 to 4-23 R#18 A#3

Storage and Transportation (continued)

Transportation

- Prior to the loading and unloading process, conveyor and other handling equipment will be clean, in good physical condition, free from disagreeable odors and from obvious dirt and/or debris. Cleaning procedures for equipment is in the SOP appendix. 4-24
A#4
- All effort will be made to ensure minimal damage to the harvested potatoes during handling and transportation. The harvested potatoes will not be handled or transported with potentially contaminating products. Proper transportation temperatures will be documented if necessary. 4-25
4-26
4-27

Worker Health and Personal Hygiene

- Employee facilities are clean and located away from harvested potatoes (eg. storage, shipping and receiving areas) 4-28
- Employees should not wear loose clothing and instead should wear snug-fitting clothes. Employees are not to wear jewelry in crop handling areas. Non-removable jewelry needs to be reported to a supervisor on advisement for how to cover the jewelry (eg. waterproof gloves). 4-30

Traceability

- Records uniquely identify the source of the incoming potatoes, storage placement and destination of the outgoing product. 4-31
R#15

Insert “SOP Appendix” Divider Here

Composting Practices Composting Practices

For producers desiring to compost manure

There are two general practices recognized by the USDA for treating manure to make it safer than raw manure. The first is passive treatments, the second is active treatments.

Passive treatment practices

Passive treatment, or aging, relies on the passage of time and environmental factors to reduce pathogens in the manure.

1. The manure is piled and allowed to age.
2. The internal temperatures of piled manure will increase initially, but as oxygen and moisture are quickly depleted, the temperatures drop. In order to kill pathogens and weed seeds, manure must be held at a minimum of 131°F for 14 days. During this time, the outsides of the pile will never reach that temperature. Pathogens may be killed with the passage of time through drying and ultra violet irradiation. Weed seeds, especially on the outside of the pile, will not be destroyed.

It will be very difficult, if not impossible, to document that the resulting product has reached the proper temperature for the proper amount of time as required by section 1-19 of the audit.

Active treatment practices

1. Manure that is to become compost must be turned frequently to maintain proper oxygen and moisture levels, and to ensure the entire amount of material is heated properly to destroy pathogens and weed seed.
2. After piling, a carbon source such as straw will need to be added to and mixed with raw manure to maintain an ideal Carbon:Nitrogen (C:N) Ratio of 25-30:1.
3. The temperature will rise and will need to be maintained at over 131°F for 14 days to destroy pathogens and weed seeds.
4. During this time, the pile will need to be mixed or aerated to maintain proper oxygenation and to ensure the entire pile is exposed to the high temperatures.
5. The recommended procedure is to follow the process known as Procedure to Further Reduce Pathogens (PFRP).
 - The pile is created, let heat for 3 days, and then turned.
 - Subsequent turnings are done every three days for a total of 5 turnings.
 - In order to comply with Section 1-21, it will be necessary to have a composting procedure and document pile temperatures and moisture content, as well as turning dates.
 - This documentation will be referred to as a time/temperature log. See next page.

Storage Pest Management Program

A rodent and bird control program has been implemented at this storage facility.

1. If rodent traps are placed inside the storage facility, only spring-loaded style traps will be used.
2. No bait traps will be used inside the storage facility. Bait traps may be used outside the storage facility only.
3. All traps will be checked frequently and bait traps will be restocked with bait when necessary. Traps will be located in several areas inside and outside around the facility.
4. If appropriate, chicken wire or netting will be used over the air intake door and exhaust louvers to help prevent birds from entering the storage facility.

Thermometer Calibration

Melting point of ice method

1. Place ice in a container and allow melting to begin.
2. Stir to insure the temperature in the ice/water mixture is uniform throughout the container.
3. When the container is filled with a 50/50 ice and water solution, insert the thermometer and wait until the temperature stabilizes.
4. If the thermometer is properly calibrated it should read 32°F (0°C).
5. If the thermometer is not reading 32°F (0°C), adjust the thermometer (if possible), use the temperature difference to adjust for the readings, or replace the thermometer.

Avoid adding tap water to the ice (to obtain the 50/50 mixture) because the mixture will *not* be 32°F (0°C) rather at a higher temperature. The calibration will be more accurate if ice is used.

Reference:

“Food Store Sanitation”, 1998, Sixth Edition, Gravani, Robert B., Rishoi, Don C., Cornell University Food Industry Management Distance Education Program, Lebharr-Friedman Books, Chain Store Publishing Corp.

Storage and Equipment Cleaning Procedures

General instructions for cleaning and disinfecting a potato storage and/or equipment:

1. Remove all plant and potato debris from the storage floor, plenum, duct pipes and/or from equipment used for production and handling.
2. Remove the top 1 to 2 inches of dirt floor and replace with soil not associated with potato production.
3. Thoroughly wash all components of the storage facility and/or equipment with soap and water or steam using a high-pressure sprayer and then rinse.
4. Use an appropriate, registered, and labeled disinfectant for your storage. Contact local suppliers or the Idaho State Department of Agriculture for an updated list of registered disinfectants.
5. When disinfecting, make sure the sprayer pressure and volume are sufficient to effectively clean all surfaces. Wet all surfaces thoroughly and allow the disinfectant to remain on the surfaces for at least 10-15 minutes to be fully effective.
6. Make sure to thoroughly clean the inside of duct pipes.
7. Close up the storage facility for 2 weeks for maximum disinfectant effectiveness and then open the facility, allowing all surfaces to dry.
8. Follow label and supplemental label instructions or hire a professional applicator.
9. Remember, storage and/or equipment cleaning and disinfecting are critical components of good potato storage management.

OnePlan Pesticide Application Recordkeeping Instructions

CONTENTS

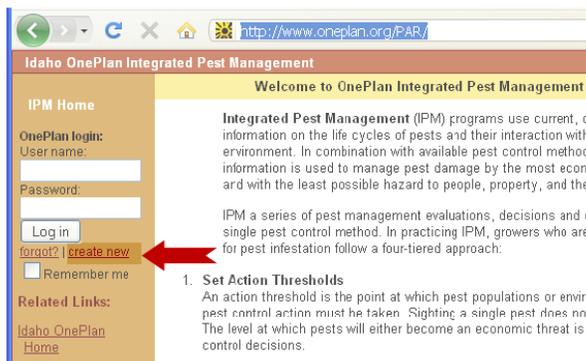
Account Setup.....	1
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OnePlan Pesticide Application Recordkeeping is on the OnePlan website, www.oneplan.org, at www.oneplan.org/PAR/

If you have an account, fill in your user name and password and **Log in**.

Account Setup

If you have not created an account before, click on **create new** link in the left-hand column.



Fill in all of the fields on the form. The security question will be used if you forget your password, and need to have it reset. Examples include: your paternal grandfather's first name, the mascot of your high school, etc.

Follow the link to read our Privacy Statement (which is also included at the end of this document).

Note the disclaimer: it is your responsibility to check product labels and make sure application and safety requirements are followed.

The screenshot shows the 'Create a OnePlan account' form. It includes a 'Privacy Statement' link, a 'Sign up for a OnePlan account' heading, and a note that 'All fields are required'. The form fields are: User Name, Password (with a note 'Password must be at least 5 characters'), Confirm Password, E-mail, Security Question, and Security Answer. There is a 'Create account' button and a disclaimer: 'You must check the labels on your products carefully. While every effort has been made to assure the accuracy of information included in this recordkeeping program, you are responsible that the information contained herein matches your product label.' At the bottom, there is a checkbox for 'I agree'.

Operation Information

Fill in the fields with the information from your operation, then click Update.

Setup: Operator/applicators > [Farm unit\(s\)](#) > [Map fields](#) > [Crop history](#)



Fill in account information for this operation. (Items are required unless indicated otherwise.)

Operator name:

Company name: (optional)

Address:

City: **State:** **ZIP code:**

Telephone:

Mobile phone:

Your applicator license number: (optional)

Applicators for this operation

Optional: set up one or more Applicators. (Enter operation info above, and **[Update]** first.)

[Continue account setup...](#)

Once your operation's basic information is entered, enter information for other applicators who you hire. Fill in the Applicator information and press **[ADD]**. You can add Applicators to your operation at any time.

When the operation and Applicator information is complete, follow the "Continue" link at the bottom of the page.

Setup: Operator/applicators > **Farm unit(s)** > [Map fields](#) > [Crop history](#)



Fill in account information for this operation. (Items are required unless indicated otherwise.)

Operator name:

Company name: (optional)

Address:

City: **State:** **ZIP code:**

Telephone:

Mobile phone:

Your applicator license number: (optional)

Applicators for this operation

Optional: set up one or more Applicators.

Applicator name	Lic. No.	Telephone	Email address		
Fred Farmer	12345	208 555-1212	FredFarmer@oneplan.org	<input type="button" value="Edit"/>	<input type="button" value="Del"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="button" value="Add"/>	

[Continue account setup...](#)

Farm Units and Medical Facilities

You can have all of your fields in one farm unit or you can organize them into multiple farm units, grouped by ownership, management, etc., but at least by *common distance to the nearest medical facility*. A Farm Unit's address may be the same as your operation's, or distinct.

Workorder maps will group fields by Farm Unit to provide the most useful scale. For each farm unit, select the medical facility you and your workers will use in case of an emergency.

Once a medical facility's information is provided, [SAVE] what you've entered, and follow the link to map the Farm Unit's fields.

Setup: [Operator/applicators](#) > [Farm unit\(s\)](#) > [Map fields](#) > [Crop history](#)



Farm fields can be optionally organized into **Farm Units** to group them by ownership, management, etc., but at least by **common distance to the nearest medical facility**. Workorder maps will group fields by Farm Unit to provide the most useful scale.

Provide information for one or more Farm Units, and fill in information for the nearest medical facility for each Unit.

Select Farm Unit to edit (or add new):

Farm Unit name:

Same as operator/company address

Address:
City: State: ZIP code:

[Map Farm Unit fields...](#)

Nearest Medical Facility

Select from the list: or enter your own information.

Name:
Address:
City: **State:** **ZIP code:**
Telephone:

[Search the web for nearest facility](#)

Mapping Farm Fields

The starting map presented on the next screen is centered on the ZIPcode you entered for the Farm Unit. Scroll the map (using the yellow arrows on the edges of the map) as needed. Click on the map to mark approximately where the Farm Unit is located, and zoom in using the numbered scale on the right side of the map. At level 5 you'll see a digital satellite view of the area around your farm. When you set a marker and zoom the map (in or out), the new view will be centered where you put the marker.

At level 4 and closer you can locate and describe individual fields. Set a marker in the center of the field, and click the [Add Field] at the bottom of the map. Fill in the field name, and specify the acreage. If your marker is in a field that's been mapped by the Farm Service Agency, the mapped acreage will be supplied as the default value. You can adjust the number if needed, or subdivide the field for this program's purposes. Once a field has been named and the acreage specified, you can click on its marker to modify the values if needed.

Crop History

Once your fields are mapped, use the “Done mapping; complete setup” link (bottom of the map page), and provide crop information for your fields. You can enter as much history as you like, but there must be at least one crop described for an application workorder to be specified on a field. Leave the “Harvested” date blank for the current crop on a field.

You can use the links at the top of the page to return to the Operation setup, the Farm Unit setup, or the field mapping forms, if needed (blue arrow in figure below).



OnePlan Pesticide Application Recordkeeping

Setup: [Operator/applicators](#) > [Farm unit\(s\)](#) > [Map fields](#) > [Crop history](#)

Crop History

Enter your operation's crop history for any crops that will have pesticide application records. Leave the harvest date blank for the current crop on a field.

Farm unit: Fred's Farm

Field name	Crop	Prev. crop harvest	Harvested		
Field 1	Wheat, winter	08/31/2009	Current	Edit	Del
Field 1	Select a crop...				Add

[Save data and go to account summary.](#)

You can Customize crops via the link in the left column (red arrow): either set up particular varieties of interest for your operation, or simply to select the subset of crops you grow, to make a shorter, convenient list. Use the “Return to Crop History” link in the left column when you’re done specifying crops for your custom list.



OnePlan Pesticide Application Recordkeeping

Operation Crop List

You can add *varieties* to standard crops, or set up your own custom crops (with or without a variety) for your operation:

Standard crops: Select a crop...

Crop name: (required)

Variety: (req'd for std. name, optional otherwise)

Optionally select only those of the standard crops that you need for recording your operation's crop history.

STANDARD CROPS	
<input type="checkbox"/>	Agroforestry
<input type="checkbox"/>	Alfalfa
<input type="checkbox"/>	Alfalfa, grass mix
<input type="checkbox"/>	Alfalfa, seed
<input type="checkbox"/>	Almond Pistachio cover

When all fields have a current crop listed, click on the **Save data and go to account summary** link at the bottom of the Crop History page.

Enter Product Information

The final step to complete your Operation setup is to enter product information for the pesticides you will specify for application. Follow the link at the bottom of the Operation Summary page, or the **Edit Products** link in the left column.

Remember to review the container label and verify all information as this can change occasionally. **The correct information is the information on your pesticide label. You are responsible for the information recorded in your pesticide database.**

OnePlan Pesticide Application Recordkeeping

Pesticide Products

The table below lists pesticide products. Those with an **[Edit]** button have been authorized for your account's workorders. Select **[Add]** to authorize a product for your account's workorders, or **[Add New]** to enter a product not on the list.

Search your product database:
Leave the search field blank to show all entries.

Searching: Name EPA reg. num. Company name AI

Include: OnePlan-supplied Active Archived All

	Product name	EPA Reg. #	Active ingredient
<input type="button" value="Edit"/>	Acrobat	241-410	dimethomorph
<input type="button" value="Add"/>	638 Herbicide	42750-36-55467	2,4-d
<input type="button" value="Add"/>	Abamectin E AG 0.15 EC	79676-58	abamectin
<input type="button" value="Add"/>	Achieve	100-1130	tralkoxydim
<input type="button" value="Add"/>	Acramite	400-514	bifenazate
<input type="button" value="Add"/>	Actara	100-938	thiamethoxam
<input type="button" value="Add"/>	Actigard	100-922	acibenzolar
<input type="button" value="Add"/>	Actinovate AG	73314-1	streptomyces lydicus wyec 108
<input type="button" value="Add"/>	Admire 2F	264-758	imidacloprid
<input type="button" value="Add"/>	Admire Pro	264-827	imidacloprid
<input type="button" value="Add"/>	Advise 2FL	1381-205	imidacloprid
<input type="button" value="Add"/>	Agree	70051-17	bacillus thuringiensis ssp. aizawai

OnePlan has provided information for a number of common products, and you can **[Add]** them to your own database, but remember to **review and verify ALL product information by reading the label on your pesticide container**. If the information is correct click the **[Use as-is]** button for the individual product review; if the provided pesticide information should be edited, click the **[Copy / edit]** button and revise as needed. You can add all the pesticides that your operation uses, or add and update your whenever needed.

Products you've specified appear at the top of the Product list (above the red line, as shown above). You can use the search specifications at the top of the form to show a subset of the complete product database available for use or specification.

Customize Lists: Crops, Pests, Products, Adjuvants

The process for adding Adjuvants is similar to that for Products. You can select from those provided, or create and edit your own entries as needed. You can create a custom pest list, similar to the Crop list described above.

Initiate Workorder

A Workorder specifies the parameters of a pesticide application job, allows you to communicate this to your Applicator, and provides the means to complete the recordkeeping of what was done, where, and when.

From the Operation Summary page check that the applicator responsible for this application is on your list of applicators. Use the Edit link next to the Applicators heading if needed. Select the appropriate Farm Unit from the drop down list. Click on the **Initiate** link in the left column.

The workorder editing form provides a sequence of specifications you need to provide:

1. Schedule **date and time** for the start and finish of the application, and the **Applicator** who will do the work;
2. The **crop** the pesticide will be applied to;
3. The **fields** in the Farm Unit that will be treated;
4. The **zone and mode** (spray, or broadcast) of the application, and for spraying, the amount of mix per acre, or total mix.
5. Information about the **equipment and its settings** is optional.
6. You can optionally specify what **pests** the application is intended to treat.
7. Specify the **products** to be applied. If the exact product is not yet in your list, you can use the “edit **Products**” link to update your product database. (There will be a link to return to the Workorder being edited.) Enter the specified rate per acre in the appropriate unit of measure (and the program calculates the total required), OR enter the total product required (and the program calculates the rate). Repeat for each product in the mix.
8. Provide **adjuvant** information, and any appropriate notes.

Data you input is generally saved as soon as possible. The [**Save**] button will return you to the Operation Summary, and partially completed specifications can be edited later. Once the required specifications have been given, the [**Review**] button is active, for final inspection and issuance of the Workorder.

If the Workorder is correct and complete, use the [**Issue**] button on the review form. When issued, the workorder form includes emergency contact information and a map of the field(s) to be treated. Your applicator will be emailed this Workorder (if you specified an email address). You can print it for mixing and loading or for your Central Posting Location.

Initiate application workorder

Workorder number: 1001110

1. Scheduled start, finish, and Applicator

Date time
 Scheduled start: 1/11/2010 AM PM
 Scheduled finish: 1/11/2010 AM PM

Applicator: Fred Farmer

2. Specify Crop: Wheat, winter

3. Specify Fields

Field	Area (ac)	Applic. area
<input checked="" type="checkbox"/> Field 1	34.78	
Total acres:		

4. Specify Type of Application

Zone of application: Full coverage Band Spot

Mode of application: Spray (liquid) Dry (granular)

Mix per acre: gal.
 Total mix: gal.

5. Specify equipment and settings:

Applicator equip.:
 Equipment speed: mph

6. Specify pests targeted by this application (optional): [\(edit pest list\)](#)

Target pests
 Select a pest...

7. Specify Product(s) to apply: [\(edit Products\)](#)

Product name	Rate/acre	Total product
Aerobal	<input type="text"/> fl oz	<input type="text"/> fl oz <input type="button" value="Add"/>

8. Specify adjuvant(s) to include: [\(edit adjuvants\)](#)

Adjuvant name	Rate/acre	Rate/100gal	Total adjuvant
<input type="text"/>	<input type="text"/> fl oz	<input type="text"/> fl oz	<input type="text"/> fl oz <input type="button" value="Add"/>

Notes:

When required data are entered, the completed workorder before issue
 You can what you've entered and continue editing later, or this

Workorder Completion and Reports

After the Application is completed, scroll to the bottom of the Application Workorder form and click the **[Journal]** button. The journaling form shows the specifications, and allows you to enter **actual** data for each parameter of the application. In addition to the specified parameters, you can enter information about the wind speed and direction, temperature, relative humidity, weather, soil condition, and any applicator notes. The **[Complete]** button at the bottom of the page marks the workorder as closed.

If for any reason the Workorder needs to be changed after it's issued, but before the work is done, you can **[Rescind]** it: the Applicator will be notified, and the specifications return to the "editing" state, where they can be modified as needed.

Repeat workorders can be specified by calling up an existing record, and using the **[Copy]** button at the bottom of the review form. You can find existing records from the **W.O. Report** link in the left column of the Operation Summary form. The **Application Report** link shows a table of completed application records, with links to the individual records. Records can be sorted, viewed and printed by a variety of categories to meet your management needs and your required regulatory recordkeeping obligations.

Field name	Current crop	PLS	Lat	Lon
Field 1	Wheat, winter	T3N R1W S11	43.80729	-116.42641

Individual workorder forms can be called up by their number, shown in the drop down lists for records in editing, issued, or completed, as the case may be.

OnePlan Privacy Statement

Other than your email address, we do not collect any personal information about you when you visit our website unless you choose to provide that information to us. We need your email address only to send an optional year end survey regarding this product as required by our sponsors.

The information you enter into this site will be stored in a secure manner.

This information will not be available to anyone, including your local Soil Conservation District, the NRCS, Idaho State Department of Agriculture, USDA, or EPA without your express permission. All information contained in any OnePlan product is protected as private information pursuant to sections 22-2718 and 9-340D, Idaho State Code.

This information will not be used for any purpose other than your own operation's Pesticide Application Recordkeeping.

Revision History

As written.....Jan. 28, 2010

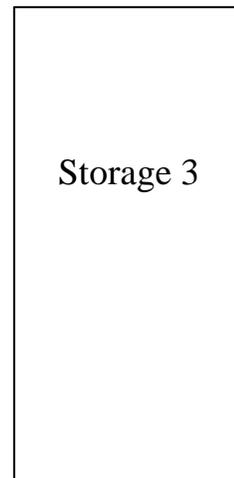
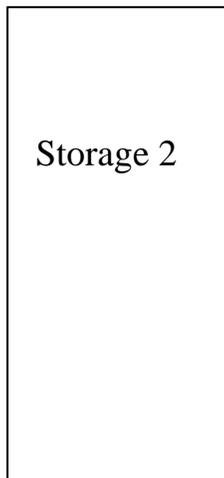
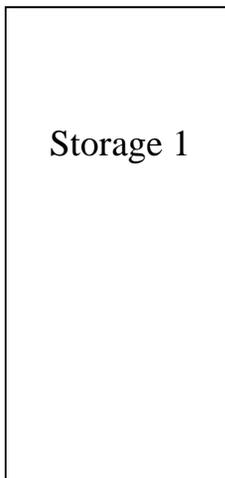
Insert “Maps” Divider Here

Insert all required maps in this section. Include farms maps of all potato growing locations or fields, legal description of each field, and floor plan maps of all on-farm potato storage facilities (if applicable). Storage facility maps must also include locations of rodent bait and traps (see example below).

Rodent Bait and Trap Locations

The following maps are examples only. Each storage needs to be individually drawn specific to that storage. Some storages may have catwalks that require placement of rodent traps and these need to be identified on the map. Attach additional pages if necessary.

(**x** denotes rodent bait traps + denotes rodent spring trap)



**Insert “Required and Non-Required
Documentation” Divider Here**

Traceability Program

Documentation for the traceability program is within 3 general categories

- 1) Crop history records– R#6, 7, 8, 9, 10, 11, 18 and Audit Checklist Information
- 2) Sanitation/cleaning– R#13, 14, 16, 17
- 3) Direct traceability of potatoes from harvest to storage or processor/fresh pack operation- R#15

Mock Recall

A Mock Recall Statement is required for G2 in the Audit

For a Grower field-run operation: Look at R#15 for required information (example shown below)

- 1) Select a specific harvest date for a field or production area
- 2) Identify cultivar planted and weight of loads leaving the field with their traceability code
- 3) Identify delivery destination

For a Storage operation: Look at R#15 for required information (example shown on next page)

- 1) Select a specific storage that is empty or being emptied.
- 2) Identify harvest date, production area, traceability code and placement in storage for each load leaving the storage
- 3) Identify delivery date and destination

Mock Recall Statement for Grower Field-Run Operation

_____ were harvested on _____ from _____
(cultivar and weight) **(date)** **(production area)**

and given traceability code(s) _____. These potatoes were delivered to _____
(code number(s)) **(destination)**

on _____ called _____
(delivery date) **(grower/GAP designee)** **(destination contact person)**

on _____ and was told they had processed _____
(date of mock recall) **(amount processed)**

and _____ remained.
(amount not processed)

Traceability Checklist Log ¹							R #15
Grower Name _____							
Harvest Date	Field or Production Area & Cultivar	Truck ID	Traceability Code	Storage name and Placement ID ²	Outgoing Date	Truck ID	Delivery Destination
9/19/09	Tower, RB	14	0919T014				SpudProc
9/19/09	Tower, RB	55	0919T055				SpudProc
9/19/09	Tower, RB	16	0919T016				SpudProc
9/20/09	Kibbie, RB	101	0920T101	Butte 2/ NWB5	2/16/10	2T512	TaterProc

¹**Bold section for grower-only operation. Fill out all columns if storage operation included.**
²Identification in storage is marked by potatoes piled in front of identified quadrant and beam.
 (Examples include flags, beam numbers, marking beam location, GPS, etc.)

Example:

Document R#15 in your GAP manual indicates 750 hundredweight of Russet Burbank potatoes harvested September 19, 2009 into 3 trucks (Traceability Code 0919T014, 0919T055, 0919T016) from Tower Field. Each load went directly to the SpudProc for processing. The grower called the SpudProc representative Tim

Jones on March 1, 2010 and was told all potatoes were processed on September 19, 2009.

Mock Recall Statement for Storage Operation

_____ were harvested on _____ from _____
(cultivar and weight) **(date)** **(production area)**

and given traceability code(s) _____. These potatoes were stored in _____
(code number(s)) **(specific storage facility)**

with ID location of _____. Potatoes were unloaded, transported by
(location in that storage facility)

_____, and delivered to _____ on
(truck number(s)) **(fresh pack/ processor)**

_____ called _____
(delivery date) **(grower/GAP designee)** **(fresh pack/ processor contact person)**

on _____ and was told they had processed _____ and
(date of mock recall) **(amount processed)**

_____ remained.
(amount not processed)

Traceability Checklist Log¹ R#15

Grower Name _____

Harvest Date	Field or Production Area & Cultivar	Truck ID	Traceability Code	Storage name and Placement ID ²	Outgoing Date	Truck ID	Delivery Destination
9/19/09	Tower, RB	14	0919T014				SpudProc
9/19/09	Tower, RB	55	0919T055				SpudProc
9/19/09	Tower, RB	16	0919T016				SpudProc
9/20/09	Kibbie, RB	101	0920T101	Butte 2/ NWB5	2/16/10	2T512	TaterProc

¹**Bold section for grower-only operation. Fill out all columns if storage operation included.**
²Identification in storage is marked by potatoes piled in front of identified quadrant and beam.
 (Examples include flags, beam numbers, marking beam location, GPS, etc.)

Example:
 Document R#15 in your GAP manual indicates that Russet Burbank potatoes (750 cwt) were harvested on 9/20/09 from Kibbie Field and given traceability code 0920T101. These potatoes were stored in Butte 2 Storage Facility with ID location of NWB5. Potatoes were unloaded, transported by truck 2T512, and delivered to TaterProc on

February 16, 2010. The grower called TaterProc's representative Sam Smith on March 1, 2010 and was told they had processed all the above potatoes and none remained in the plant.

Potable Water

Potable water supplied to the employee is:

Municipality

(municipality name)

Well

Attach water test

Bottled

(brand name)

Worker Training Log

Employee name	Employee signature	Training date	Method*	Trainer's Initials
1. _____	_____	_____	_____	_____
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____
5. _____	_____	_____	_____	_____
6. _____	_____	_____	_____	_____
7. _____	_____	_____	_____	_____
8. _____	_____	_____	_____	_____
9. _____	_____	_____	_____	_____
10. _____	_____	_____	_____	_____
11. _____	_____	_____	_____	_____

***Training method - video, formal group presentation, one-on-one presentation, demonstration. Include follow-up or reviews.**

R#3 For G5

EMPLOYEE HEALTH AND HYGIENE POLICIES

- All employees and visitors to the location are required to follow proper hygiene procedures.
- Employees must wash their hands before beginning or returning to work (eg. from all breaks, use of restroom facilities). Signs will be posted in designated areas to remind you of this policy.
- Rest areas and restrooms will be equipped with soap and water for washing hands. Only use single-use towels to dry hands and place in waste receptacle. Hand washing water must be potable. However, in some instances, the operation may add chlorine or other acceptable agents to potable water in order to further reduce the possibility of contamination during hand washing. Although this water may not be suitable for drinking it shall be acceptable for hand washing. Employees will use the restrooms in a manner to maintain usability and will report any lack of usability to a supervisor. Used toilet tissue must be placed into the toilet fixture.
- Employees should not wear loose clothing and instead should wear snug-fitting clothes. Employees are not to wear jewelry in crop handling areas. Non-removable jewelry needs to be reported to a supervisor on advisement for how to cover the jewelry (eg. waterproof gloves).
- Smoking, eating and drinking are allowed in designated areas only. Signs will be posted to remind you of those locations. Enclosed vehicles may be used as a designated location. Only bottled water is acceptable in the work area provided it is in clear plastic containers and stored below the product flow zone. Glass containers are not allowed in the fields, storages or near the harvest operation. Garbage containers will be provided and maintained in the eating area.
- If you are experiencing flu like symptoms or have infectious conditions, you are prohibited from handling harvested potatoes.
- If you have knowledge of harvested potatoes that has come in contact with blood or other body fluids, you must report it to supervisors so that contaminated produce can be discarded. Potatoes that have come into contact with blood or other body fluids will be disposed of, buried, burned or put into safe garbage container. Machinery that has come into contact with blood or other body fluids will be disinfected with bleach or other safe disinfectants.
- First aid kits are available for all employees. Any cuts, abrasions or other injuries must be immediately reported to a supervisor and properly and promptly treated.

EMPLOYEE HEALTH AND HYGIENE POLICIES (continued)

- You are required to always be watchful for foreign material such as; glass, metal, golf balls, packaging materials, rocks, bones, personal effects, insects, rodents, parts or feces. Any broken glass must be immediately reported to a supervisor for proper clean up.
- Any type of foreign material must be removed from the harvested potatoes or avoided in the field. If you are unable to remove the foreign material, contact your supervisor with information on the location of the material.
- You need to be alert for potential chemical hazards such as pesticides, oils, and fuels. Any type of leak or spill needs to be reported to the supervisor for immediate attention.
- Employees who are stationed around equipment must know the location of the controls to safely start and stop machinery. You must notify a supervisor immediately if there are any unsafe conditions with the equipment that may endanger employees or contaminate potatoes.
- Keep any type of chemical containers away from harvested potatoes and raw potato storage areas.
- Monitor crop production areas and document the presence, signs, or non-presence of wild or domestic animals entering the land/production or storage areas.
- If you are responsible for pesticide applications, you must be properly trained on best management practices, have read and understood the pesticide label, and, if necessary, be certified by Idaho State Department of Agriculture to apply restricted use pesticides.

- **I have received orientation on the above information and fully understand the required policy.**

- **Employee Signature**_____

- **Date**_____

- **Supervisor Signature**_____

- **Date**_____

POLITICAS DE SALUD E HIGIENE DEL EMPLEADO

- Todos los empleados y visitantes de este predio deben seguir procedimientos apropiados de higiene.
- Los empleados deben lavarse las manos antes de comenzar o antes de volver al trabajo (por ejemplo. Después de un descanso o intermedio, use los lavamanos del baño). Figuras/Símbolos serán colocados en áreas designadas para recordar esta política.
- Las zonas de descanso y los baños serán equipados con jabón y agua para lavarse las manos. Se debe usar solamente toallas descartables para secarse las manos y colocarlas en el basurero. El agua para lavarse las manos debe ser potable. Sin embargo, en algunos casos el proceso puede incluir en el agua potable, cloro u otros agentes aceptables, para reducir más aún la posibilidad de contaminación durante el lavado de las manos. Aunque esta agua puede no ser adecuada para beber será apropiada para el lavado de las manos. Los empleados deberán usar los baños de forma higiénica y mantener su utilidad reportando cualquier desperfecto o mal uso a un supervisor. El papel higiénico usado debe ser colocado en el interior del inodoro o letrina.
- Los empleados no deberán vestir ropa suelta y en su lugar, deberán vestir ropa ajustada y cómoda. Los empleados no están autorizados a portar joyas en áreas de manipulación de la cosecha. Joyas que no se pueden quitar, se deben reportar a un supervisor para buscar la forma de cubrirlas. (Ej. Guantes de goma)
- Fumar, comer y beber es permitido solamente en áreas designadas. Figuras/Símbolos serán colocados para reconocer esos lugares. Los vehículos dentro del predio se pueden utilizar como área designada. Solamente el agua embotellada es admisible en el área de trabajo siempre y cuando esté en envase plástico claro y se mantenga alejada de la zona de flujo de producto. Los envases de cristal no se permiten en los campos, almacenes o cerca a la labor de cosecha. Envases de basura serán proporcionados y mantenidos en áreas en que se permite comer.
- Si usted está sintiendo síntomas de gripe o parecidos, o sobrelleva un estado infeccioso, se le prohíbe manipular las papas cosechadas.
- Si usted tiene conocimiento que las papas cosechadas han entrado en contacto con sangre u otros fluidos corporales, usted debe informar de esto a los supervisores para poder desechar el producto contaminado. Papas que han entrado en contacto con sangre u otros fluidos corporales serán desechadas, enterradas, quemadas o puestas en un envase de basura protegido. La maquinaria que ha entrado en contacto con sangre u otros fluidos corporales será desinfectada con cloro u otros desinfectantes adecuados.
- Los botiquines de primeros auxilios están disponibles para todos los empleados. Cualquier corte, herida u otras lesiones deben ser comunicadas inmediatamente a un supervisor y ser tratadas adecuadamente y sin demora.

- Usted está en la obligación de estar siempre alerta a la posible presencia de cualquier material diferente a la cosecha (material extraño) por ejemplo; cristal, metal, pelotas de golf, materiales de empaquetado, rocas, huesos, efectos personales, insectos, roedores, partes/porciones de algo o heces. Cualquier pieza de vidrio roto, debe ser reportada inmediatamente a un supervisor para su correspondiente limpieza.
- Cualquier tipo de material extraño se debe evitar en el campo o apartar de las papas cosechadas. Si usted no puede retirar el material extraño, contáctese con su supervisor e infórmele sobre la localización del material.
- Usted necesita estar alerta a potenciales riesgos químicos tales como pesticidas, aceites, y combustibles. Cualquier tipo de fuga o derrame necesita ser comunicado al supervisor para su atención inmediata.
- Los empleados que tienen su puesto de trabajo alrededor de un equipo o maquinaria, deben conocer la localización de los controles para poner en marcha y detener sin peligro la maquinaria. Se debe notificar a un supervisor inmediatamente en caso de existir cualquier desperfecto del equipo que ponga en riesgo a los empleados o contamine las papas.
- Guarde cualquier tipo de envases químicos lejos de las papas cosechadas y de los almacenes de papa cruda.
- Supervise las áreas de producción de papa y documente la ausencia o la presencia, huellas, de animales salvajes o domésticos que ingresan al terreno de producción o a los almacenes.
- Si usted es responsable de la aplicación de pesticidas, debe estar apropiadamente entrenado en la mejor forma de manipulación, haber leído y entendido la etiqueta del pesticida, y si es necesario, estar certificado por el Departamento de Agricultura del Estado de Idaho para aplicar pesticidas de uso controlado.

- **Recibí orientación sobre la información indicada arriba y entiendo toda la política requerida.**

- **Firma del Empleado** _____

Fecha _____

- **Firma del Supervisor** _____

- **Fecha** _____

Field and Post-Harvest Pesticide Treatment Report Form* List all

Page ____ of ____

soil treatments, preplant soil and seed treatments, post plant soil and foliar treatments. Include all fumigants, herbicides, insecticides, fungicides, growth regulators, vine killers, etc.

Field Number(s)- Acres:

Grower/Farm Name:	Field Location:	State:	County:
Storage/Processing Site:	Variety:	Total Acres or Weight treated:	

*Application Method: G=Ground A=Air C=Chemigation W=Ground Application - Water Incorporated

** Pesticide Type: 0=Repellant 1=Seed Treatment 2=Fumigant 3=Nematicide 4=Herbicide 5=Fungicide 6=Insecticide 7=Grow Regulator 8=Sprout Inhibitor 9=Desiccant

*** Rate Type: Field: Acre, 1000ft/row, 1000 sq ft Seed: CWT (100 lbs) Dilution: 10 gal, 50 gal, 100 gal

**** Target Pest Type: 1=Bacterial 2=Fungal 3=Viral 4=Chewing Pest 5=Sucking Pest 6=Tube/Root Pest 7=Broadleaf Weed 8=Grass 9=General Weed

Treatment Date & Time Start/Finish	Field #	Acres Treated	App Method*	Pesticide Type**	Product Name and Formulation	Rate	Unit of Measure	Rate Type ***	Primary Target Pest	EPA No.	Sensitive Area Y/N	Wind speed	Wind Direction	Temp	Applicators License # or Training Date if no license	Name of Applicator

Grower Signature: _____ Date: _____ Field Rep Review Initials: _____ Date: _____

Another good on-line pesticide application and crop history program is available free of charge at www.oneplan.org/PAR/ Also see instruction by clicking [Help/Instructions document](#).

R#6 For G15

Irrigation Water Log

Water Source	Location	Dates sampled			Laboratory	Results (see attached)

Animal Presence Log

Date	Field/Location	Animal Presence or Sign	Action Taken	Initials

R#8 For 1-12 1-13

Pre-harvest Assessment

Field or Production area: _____

Date: _____

Questions	Yes	No	Action Taken	Initials
Are toilets and wash facilities properly located?				
Is potable water available for workers?				
Is harvest equipment available and in good condition?				
Is there evidence of unauthorized entry in the crop area and if so has it been investigated?				
Is there evidence of domestic or wild animal crop damage?				
Is there evidence of physical contamination in the crop area?				
Are possible fuel and chemicals contaminates isolated from the crop area?				
Has the land use history and other possible biological or physical sources of contamination been assessed and action taken if needed?				
Are contaminated areas isolated for “no harvest”?				
Is transportation equipment available and clean?				

Projected Harvest Date: _____

R#12 For 2-1

Harvesting Container Log

Date	Type of Container	Cleaned (Y/N)	Sanitized (Y/N)	Disinfectant Product Used	Initials

Traceability Checklist Log¹

Grower Name _____

Harvest Date	Field or Production Area & Cultivar	Truck ID	Traceability Code	Storage Name and Placement in Storage ²	Outgoing Date	Truck ID	Delivery Location

¹**Bold section for grower field-run only operation. Fill out all columns if storage operation included.**

²Identification in storage is marked by _____.
(Examples include flags, beam numbers, marking beam location, GPS, etc.)

Additional Documents
(Not necessarily required)

Illness/Injury Reporting Log

Date	Name of Employee	Injury Sustained/ Illness Reported	Action Taken (ice applied, bandaged, sent to hospital, etc.)	Did Employee Return To work? (Yes or No)	Supervisor Initials

First Aid Kit Monitoring Log

Date	Location or # of First Aid Kit	Checked & Stocked	List Added Items (band aids, ointment, etc)	Initials

For
G14

Ice Sanitation Log

Potable water supplied for ice production is from

Municipality

_____ (municipality name)

Well

Attach water test

Purchased Ice

_____ (company name)

Date	Type of Equipment/Container	Sanitized (Y/N)	Product Used

For 4-9 4-22

Insert “Signed Policy” Divider Here

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- **Recibí orientación sobre la información indicada arriba y entiendo toda la política requerida.**

- **Firma del Empleado** _____
Fecha _____

- **Firma del Supervisor** _____
Fecha _____

Insert “USDA Audit” Divider Here

Visit the website below to insure that you have the current USDA Good Agricultural Practices (GAP) Audit Verification Checklist.

U.S. Department of Agriculture (USDA): Fresh Product Grading and Quality Certification:

Print the most current Audit checklist for the manual from:

<http://www.ams.usda.gov/gapghp>

If there is a revised GAP Audit Verification checklist, remember to change your SOP, documents etc., to correspond to the changes in this newly revised checklist.

Insert “Miscellaneous” Divider Here

This miscellaneous section is provided to insert additional documentation or relevant material applicable to your food and farm safety program. Additional educational materials can be found from the following websites:

- U.S. Department of Agriculture (USDA): Fresh Product Grading and Quality Certification: <http://www.ams.usda.gov/gapghp>
 - Download the current USDA Audit Checklist
 - View the 'Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables (The Guide)'
 - GAP Program Informational Brochure

- Good Agricultural Practices Network for Education and Training Cornell University: <http://www.gaps.cornell.edu/>
 - Order video tapes, guides, pamphlets, signs and other materials to help implement your farm and food safety program
 - Links to additional websites

- University of Maine Potato Program, Good Agricultural Practices Information: www.umaine.edu/umext/potatoprogram/gap_good_agricultural_practices.htm
 - Template for Standard Operating Procedure (SOP) for farm and food safety program
 - Utilize forms for a self-audit of the USDA Audit Checklist

- Idaho State Department of Agriculture, FFV Food Safety Program: <http://www.idahoag.us/Categories/InspectionsExams/FoodSafety/indexfoodSafetyHome.php>
 - USDA Audit Checklist and fee schedule
 - Primus Labs affiliated audit and fee schedule

- University of Idaho
 - UI Gap Audit Organizational Manual <http://www.kimberly.uidaho.edu/potatoes/gap.htm>
 - Continuing to Manage Foreign Material for Quality Idaho Potatoes, DVD (English/Spanish)
 - Managing Foreign Material for Quality Idaho Potatoes
 - Cleaning and Disinfecting Potato Storages, VHS
 - To order go to: <http://www.info.ag.uidaho.edu/>